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May 7, 2018

ATTN: Dana Wilson,  
Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Disability Rights Office  
445 12th Street, SW  
Washington, DC 20554

## CG DOCKET NO. 03-123/Arkansas

Dear Ms. Wilson,

I am the attorney for Arkansas Deaf and Hearing Impaired Telecommunications Services Corporation ("ADHITS"). It administers Arkansas' Relay Services Program. This letter is to ensure the FCC that ADHITS is in full compliance with all rules.

Pursuant to the Commission's request, Arkansas Relay Service hereby supplements previously filed TRS recertification application with the enclosed information.

I hereby certify that Arkansas Relay Service is in compliance to the rule sections noted in the Commission's follow up inquiry email, and is complying with all requirements of CPNI that are now TRS mandatory minimum standards. We concur with and restate on behalf of ADHITS the compliance filing by Sprint (see Attachment A).

The Relay Program Manager in Sherita Kennedy's e-mail to ADHITS under 64.604(c)(2) lists Nathan Burleson. He has departed that position and was replaced by Alice Berry. Our original filing listed Alice, instead of Nathan. I have attached as Attachment B to this letter the correct listing of contacts as they stand today.

If there are any questions regarding this filing, please contact me.

Respectfully submitted,

DOVER DIXON HORNE PLLC

  
Steve L. Riggs

SLR/als

## ATTACHMENT A

### SPRINT'S STATEMENT OF CPNI COMPLIANCE

Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting Arkansas's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is Arkansas's responsibility to certify Arkansas's TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address Arkansas's compliance as the Arkansas TRS program administrator or the activities of any other contractors that Arkansas may use to support the Arkansas TRS program. Per the FCC, Arkansas has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

#### **Data Brokers**

As Arkansas's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

#### **CPNI Complaints**

As Arkansas's contractor, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

#### **Use, Disclosure and Access to CPNI**

As Arkansas's contractor, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

#### **Safeguards**

As Arkansas's contractor, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to preserving customer privacy, as Arkansas's contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As Arkansas's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

**Authentication**

Sprint does not currently offer users of the Arkansas TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time with respect to Sprint's role as Arkansas's contractor.

**Notification of Account Changes**

Sprint provides notice to Arkansas's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

**Notification of CPNI Breaches**

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of Arkansas TRS CPNI during the certification period.

## ATTACHMENT B

### ADHITS CONTACTS PER RULE 64.604(a)(1)(v)

Alice Berry  
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#### **Contact for TRS Complaints:**

Steve Riggs, Attorney for the Board  
425 West Capitol, Suite 3700  
Little Rock, AR 72201  
Voice: 501-375-9151  
Email: [sriggs@ddh-ar.com](mailto:sriggs@ddh-ar.com)