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STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION

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May 9, 2018

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

RE: CG Docket Number 03-123
Relay New Hampshire
FCC Certification Renewal Supplemental Information

Dear Ms. Wilson:

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

I hereby certify that Relay New Hampshire is in compliance to the rule sections noted in the Commission's follow up inquiry email.

If there are any questions regarding this filing, please contact Kath Mullholand, Director of Regulatory Innovation and Strategy via email at kath.mullholand@puc.nh.gov or by phone at 603-271-2431.

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "MH", written over a horizontal line.

Martin P. Honigberg
Chairman

64.604(a)(v) Mandatory Minimum Standards

CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.

Consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stay with the call for a minimum of twenty minutes.

64.606(d) Method of Funding

Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Funding for intrastate TRS is not separately identified or labeled on local telephone bills. As such Relay New Hampshire is in compliance with this requirement.

64.5105 – 64.5110 TRS Customer Proprietary Network Information

Because 64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.

Compliance certification attached.

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Annual Section 64.5109 CPNI Certification
NH Public Utilities Commission – Relay New Hampshire

Relay New Hampshire certifies that the New Hampshire TRS program administrator neither uses nor accesses CPNI data other than for potential investigation to prevent fraud, abuse or misuse of TRS funds.

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 New Hampshire's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is New Hampshire's responsibility to certify New Hampshire'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 New Hampshire's compliance as the New Hampshire TRS program administrator or the activities of any other contractors that New Hampshire may use to support the New Hampshire TRS program. Per the FCC, New Hampshire 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 New Hampshire's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

CPNI Complaints

As the New Hampshire'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 New Hampshire'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 New Hampshire'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 New Hampshire'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 New Hampshire'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 New Hampshire's 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 New Hampshire's contractor.

Notification of Account Changes

Sprint provides notice to New Hampshire'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 New Hampshire TRS CPNI during the certification period.