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Governor

State of Wyoming
Department of Workforce Services
DIVISION OF VOCATIONAL REHABILITATION
WYOMING RELAY

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John Cox
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CG Docket No. 03-123

May 11, 2018

Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office
Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

Reference: Customer Proprietary Network Information (CPNI) Compliance Certification

Ladies and Gentlemen:

Pursuant to the Federal Communications Commission's rules, 47 C.F.R. §64.5109, the State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation, Wyoming Relay program hereby certifies that Wyoming Relay has established operating procedures to ensure compliance with the Federal Communications Commission's (FCC) CPNI rules (see 47 C.F.R. §64.5101 *et seq.*). Additionally, Wyoming Relay makes available adequate procedures and remedies to ensure that Wyoming's Telecommunications Relay Service (TRS) provider, Sprint, also complies with the FCC's CPNI rules. The State of Wyoming, Department of Workforce Services, Division of Vocational Rehabilitation, Wyoming Relay program takes very seriously the protection of CPNI for all users of Wyoming Relay services. The State of Wyoming's TRS contract requires that the provider comply with all FCC rules and regulations. Wyoming's contract with Sprint contains language to ensure privacy and confidentiality of all of each customer's information. Sprint's Statement of CPNI Compliance is attached (Attachment A).

Data Brokers

No actions against data brokers were necessary because Wyoming Relay has not detected nor has Sprint detected any activities by data brokers during the certification period.

CPNI Complaints

Zero Wyoming Relay customer complaints concerning the unauthorized release of TRS CPNI have been received by Wyoming or by Wyoming's contractor Sprint

Use, Disclosure and Access to CPNI

Wyoming Relay and Wyoming Relay's contractor, Sprint, did not use, disclose or permit access to TRS CPNI during 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Wyoming Relay and 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. §64.5101(c).

Safeguards

Wyoming Relay personnel rarely if ever have access to CPNI information. However, Division of Vocational Rehabilitation staff at all levels receive training on protecting customer's privacy including measures to protect against unauthorized access of any customer information and rules and procedures for ensuring strict confidentiality of all customer information.

As Wyoming's TRS 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 Wyoming'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 Wyoming'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

The Wyoming Relay program does not offer users access to TRS CPNI. Sprint does not currently offer users of Wyoming 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 Wyoming's contractor.

Notification of Account Changes

Sprint provides notice to Wyoming 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

There have been no CPNI breaches during the certification period. However, in accordance with the FCC's rules, Sprint would provide notice to law enforcement in the event a breach of Wyoming Relay customer information, including CPNI, did occur. Sprint would also provide notice to impacted Wyoming Relay customers after completing the process of notifying law enforcement. Such notification would provide 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 an impacted customer alerts Sprint or Wyoming Relay staff of a potential breach, Sprint will investigate the customer's allegations and communicate as necessary with the customer and/or law enforcement.

If you need any additional information or have any questions regarding Wyoming's CPNI compliance certification, please notify me and I will be happy to assist.

Respectfully,



Lori Cielinski
TRS Program Consultant



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

CPNI Complaints

As the Wyoming'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 Wyoming'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 the Wyoming'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 Wyoming'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 Wyoming'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 Wyoming 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 Wyoming's contractor.

Notification of Account Changes

Sprint provides notice to Wyoming 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 Wyoming TRS CPNI during the certification period.