

May 21, 2018

Dana Wilson  
Federal Communications Commission  
Disability Rights Office  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Telecommunications Relay Services State Certification Application – Supplemental Information  
CG Docket No. 03-123

Dear Ms. Wilson,

The Minnesota Department of Commerce-Telecommunications Access Minnesota (Commerce-TAM) submits the enclosed supplemental information to Minnesota's application for renewal of the certification for Minnesota's Telecommunications Relay Services (TRS) program.

The supplemental information further establishes, as required by 47 C.F.R. § 64.606 (b) (1), that Minnesota's TRS program (1) "meets or exceeds all operational, technical, and functional minimum standards contained in §64.604"; (2) "makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints"; and (3) where the program "exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law."

Commerce-TAM certifies that it has complied, and will continue to comply, with the Americans with Disabilities Act (ADA) standard relay guidelines, and will oversee its current TRS provider, Sprint, to ensure that all requirements are met.

If you have any questions, or require additional documentation, please feel free to contact me.

Sincerely,



Rochelle Garrow, TAM Administrator  
Phone: 651-539-1878 / 1-800-657-3599  
E-mail: [rochelle.garrow@state.mn.us](mailto:rochelle.garrow@state.mn.us)

## Supplemental Information to Minnesota's Application for Renewal of the Certification for Minnesota's Telecommunications Relay Services Program

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1. Under section §64.604 (a)(1)(ii), replace the STS Training outline found on pages 9-10 with the below STS Training Outline.

STS TRAINING OUTLINE	
Sprint Accessibility Values and Goals	
<ul style="list-style-type: none"> <li>Training Agenda</li> <li>Objectives / Training Outline</li> <li>Introduction and History</li> <li>Video</li> <li>Service Description</li> <li>Characteristics of Customers</li> <li>Stereotypes</li> </ul>	<ul style="list-style-type: none"> <li>Speech-Disabilities</li> <li>Attributes of Speech-to-Speech Relay CAs</li> <li>Speech-to-Speech versus Traditional Relay</li> <li>FCC Requirements</li> <li>Speech-to-Speech Variations</li> <li>Assessment</li> </ul>
<ul style="list-style-type: none"> <li>Work Performance Components</li> <li>Basic Call Processing</li> <li>Call set up</li> <li>Customer Database</li> <li>Frequently Dialed Numbers</li> <li>Customer Requests</li> <li>Emergency Call Processing</li> </ul>	<ul style="list-style-type: none"> <li>Confidentiality</li> <li>Transparency</li> <li>Personal Conversations</li> <li>Developmental Skill Practice</li> <li>Audio</li> <li>Observation</li> </ul>
<ul style="list-style-type: none"> <li>Participation</li> <li>CA training</li> <li>Taking over calls – 20 minutes</li> <li>CA work performance</li> </ul>	<ul style="list-style-type: none"> <li>Call Focus</li> <li>Teamwork – support peer</li> </ul>
<ul style="list-style-type: none"> <li>Confidentiality and Transparency</li> <li>Discuss call speech patterns</li> <li>Discuss techniques customer uses</li> <li>Have two CAs on one call if necessary or customer requests.</li> </ul>	<ul style="list-style-type: none"> <li>Unacceptable to:</li> <li>Have conversation regarding information discussed on calls</li> <li>Discuss customers in general</li> </ul>

2. Under §64.604 (a)(1)(v)(B), (pages11-12), replace the text with the following:

Minnesota Relay exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice with Sprint, calls are not taken over unless it is absolutely necessary to do so. Sprint CAs are trained to use on-screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS inbound customer (20 minutes with STS), a CA may be relieved if it is appropriate.

The only situations in which a CA would transition during a call, prior to the FCC minimum standard of 10 minutes, (20 minutes for STS) include:

- The customer requests a CA of the opposite gender, or requests a different CA.
- The relay user is verbally abuse to, or uses obscenity towards, the CA.
- The call requires a specialist (STS, Spanish, etc.).
- The CA becomes ill.
- At the request of the customer for any reason.
- The CA becomes aware of a conflict of interest, such as identifying the caller as a friend or family member.

In addition, there are situations that may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of 10 minutes (20 minutes for STS calls). These include:

- A shift change.
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed, or 60 minutes or more of an average call.

If the transition of a CAs is unavoidable, the change occurs with minimal disruption to either relay participant, including the following:

- Sprint attempts to honor any requests for a specific gender during call transitions.
- The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

3. After section §64.604 (c)(7), (pages 66-67), insert the following:

## **47 C.F.R. § 64.604 (d) Other Standards**

### **§64.604 (d)**

The applicable requirements of §§64.605, 64.611, 64.615, 64.617, 64.621, 64.631, 64.632, 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110 of this part are to be considered mandatory minimum standards.

- §64.605 *Emergency calling requirements*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.611 *Internet-based TRS registration*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.615 *TRS User Registration Database and administrator*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.617 *Neutral Video Communication Service Platform*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.621 *Interoperability and portability*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.631 *Verification of orders for change of default TRS providers*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §64.632 *Letter of authorization form and content*. Not applicable; Minnesota does not contract to provide Internet-based TRS.
- §§64.5105, 64.5107, 64.5108, 64.5109, and 64.5110 *TRS Customer Proprietary Network Information*. Minnesota's contract for the provision of TRS includes the following requirement:

The awarded Contract Vendor shall provide Telecommunications Relay Services (TRS), including Captioned Telephone Services, that are in full compliance with the requirements and intent of Title IV of the Americans with Disabilities Act of 1990, 47 U.S.C. § 225, and Federal Communications Commission (FCC) regulations codified at 47 C.F.R. §§ 64.601 through 64.605 (at the time of proposal and subsequent to it), which are hereby incorporated by reference as mandatory standards required in the context of this RFP and resulting awarded Contract, whether or not said standards are specifically mentioned, named, or referred to in this RFP.

As required by 47 C.F.R. § 64.5109(e), Minnesota's TRS provider, Sprint, files a TRS Customer Proprietary Network Information (CPNI) Compliance Certification with the FCC on an annual basis (as applicable), in which it certifies that it has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. Sprint's certifications include information on how it complies with the CPNI requirements. Please see Attachment A.

Commerce-TAM, as the administrator of Minnesota's TRS program, filed its CPNI Compliance Certification with the FCC on May 21, 2018. Please see Attachment B.

## Attachment A

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May 21, 2018

Federal Communications Commission  
Consumer and Governmental Affairs Division  
Disability Rights Office  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: TRS Customer Proprietary Network Information Compliance Certification  
CG Docket No. 03-123

I, Rochelle Garrow, administrator of Minnesota's Telecommunications Relay Services (TRS) program, certify that I have personal knowledge that Minnesota's TRS provider, Sprint, has established operating procedures that are adequate to ensure compliance with the FCC's TRS Customer Proprietary Network Information (CPNI) rules. (See 47 C.F.R. 64.5101, et seq.)

Minnesota's contract for the provision of TRS includes the following requirement:

The awarded Contract Vendor shall provide Telecommunications Relay Services (TRS), including Captioned Telephone Services, that are in full compliance with the requirements and intent of Title IV of the Americans with Disabilities Act of 1990, 47 U.S.C. § 225, and Federal Communications Commission (FCC) regulations codified at 47 C.F.R. §§ 64.601 through 64.605 (at the time of proposal and subsequent to it), which are hereby incorporated by reference as mandatory standards required in the context of this RFP and resulting awarded Contract, whether or not said standards are specifically mentioned, named, or referred to in this RFP.

As required by 47 C.F.R. § 64.5109(e), Minnesota's TRS provider, Sprint, files a TRS CPNI Compliance Certification with the FCC on an annual basis (as applicable), in which it certifies that it has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. Sprint's certifications include information on how it complies with the CPNI requirements.

I am not aware of any instance in the past year in which Minnesota's TRS Provider, Sprint (or its agents or subcontractors), used, disclosed, or permitted access to CPNI without complying with the approval procedures specified in the TRS CPNI rules.

If you have any questions, or require additional documentation, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Rochelle Renee Garrow".

Rochelle Garrow

Telecommunications Access Minnesota Administrator

Phone: 651-539-1878 / 1-800-657-3599

E-mail: [rochelle.garrow@state.mn.us](mailto:rochelle.garrow@state.mn.us)



# Attachment B

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**Sprint Corporation**  
Mailstop VARESA0209  
12502 Sunrise Valley Drive  
Reston, VA 20196  
Office: (703) 592-7580  
Fax: (703) 433-4084

**Maureen Cooney**  
Head of Privacy  
Office of Privacy  
[Maureen.Cooney@sprint.com](mailto:Maureen.Cooney@sprint.com)

***Electronic Filing via ECFS***

March 4, 2014

Mr. Greg Hlibok  
Federal Communications Commission  
Disability Rights Office  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: **Annual TRS CPNI Compliance Certification, CG Docket No. 03-123**

Dear Mr. Hlibok:

Attached, for filing in CG Docket No. 03-123, is the Annual 47 C.F.R. §64.5109(e) T R S CPNI Compliance Certification and accompanying statement of Sprint Corporation.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Respectfully submitted,

A handwritten signature in blue ink that reads "Maureen Cooney". The signature is written in a cursive, flowing style.

Maureen Cooney  
Head of Privacy – Office of Privacy  
Sprint Nextel Corporation



**Sprint Corporation**  
1300 E. Rochelle Blvd.  
Irving, TX 75062  
Phone: 972-405-2526  
Fax: 404-649-9001

**Nancy A. Salisbury**  
Vice President – Western Region  
Nancy.Salisbury@sprint.com

**2013 Annual 47 C.F.R. §64.5109(e) TRS CPNI Certification  
CG Docket 03-123**

Date Filed: March 4, 2014

Name of company covered by this certification: Sprint Corporation

Name of Signatory: Nancy A. Salisbury

Title of Signatory: Vice President – Western Region

I, Nancy A. Salisbury, certify that I am an officer of Sprint Corporation and I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules (see 47 C.F.R. §64.5101 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company is in compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. The statement also addresses any (1) actions taken against data brokers, (2) customer complaints received in the past year concerning the unauthorized release of TRS CPNI, and (3) instances where the TRS provider, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the procedures specified in this subpart.

The company represents and warrants that the certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Executed on

3-4-2014

Nancy A. Salisbury  
Vice President – Western Region  
Sprint Corporation

Attachment: Accompanying statement

**SPRINT CORPORATION  
ATTACHMENT A  
2013 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

The following statement explains the operating procedures established by Sprint Corporation (f/k/a Sprint Nextel Corporation) ("Sprint" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("FCC" or "Commission") TRS Customer Proprietary Network Information ("TRS CPNI") rules (see 47 C.F.R. §64.5101 *et seq.*).

**Data Brokers**

Sprint did not detect any pretexting activities by data brokers in 2013. Therefore, Sprint did not institute any proceedings or file any petitions against any data broker in any state commission, the court system or the FCC. Sprint continues to deploy safeguards to protect against, detect, and mitigate pretexting activities.

**CPNI Complaints**

Sprint did not receive any complaints in 2013 concerning the unauthorized release of TRS CPNI.

**Use, Disclosure and Access to CPNI**

Sprint did not use, disclose or permit access to TRS CPNI in 2013 without complying with the procedures specified in 47 C.F.R. §64.5101 *et seq.* More specifically, Sprint does 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). As such Sprint does not send notices, or obtain approvals, for the use of TRS CPNI.

**Safeguards**

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, the Company has a variety of training programs for its employees and contractors. The training explains how Sprint employees and contractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. In 2013, the employee completion rate for this training was 100%.

Sprint also maintains a disciplinary process as part of Company 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 independent contractors or joint venture partners, Sprint enters into agreements with strict privacy and confidentiality provisions that require third parties to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews Sprint's standard privacy-related contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires independent contractors and joint venture partners 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 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.

**Notification of Account Changes.**

A Sprint iTRS customer may provide Sprint with a password for an online account and his/her physical and electronic address. Sprint will ensure that customer notifications are made when any such account information is changed, in accordance with the Commission's rules.

**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2013 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

**Notification of CPNI Breaches**

In accordance with the Commission'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 Corporation**  
Mailstop VARESA0209  
12502 Sunrise Valley Drive  
Reston, VA 20196  
Office: (703) 592-7580  
Fax: (703) 433-4084

**Maureen Cooney**  
Head of Privacy  
Office of Privacy  
[Maureen.Cooney@sprint.com](mailto:Maureen.Cooney@sprint.com)

***Electronic Filing via ECFS***

Executed on: February 27, 2015  
Date filed: March 2, 2015

Mr. Greg Hlibok  
Federal Communications Commission  
Disability Rights Office  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: **2014 Annual TRS CPNI Compliance Certification, CG Docket No. 03-123**

Dear Mr. Hlibok:

Attached, for filing in CG Docket No. 03-123, is the annual 47 C.F.R §64.5109(e) TRS CPNI Compliance Certification and accompanying statement of Sprint Corporation.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Respectfully submitted,

A handwritten signature in blue ink that reads "Maureen Cooney". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Maureen Cooney  
Head of Privacy – Office of Privacy  
Sprint Corporation





**Sprint Corporation**  
6360 Sprint Parkway  
Overland Park, KS 66251  
Phone: 913-762-7000  
Fax: 913-523-0302

William Esrey  
Vice President – Sprint Relay  
Bill.Esrey@sprint.com

**2014 Annual 47 C.F.R. §64.5109(e) TRS CPNI Certification  
CG Docket 03-123**

Date Filed: February 27, 2015

Name of company covered by this certification: Sprint Corporation

Name of Signatory: William Esrey

Title of Signatory: Vice President – Sprint Relay

I, William Esrey, certify that I am an officer of Sprint Corporation and I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules (see 47 C.F.R. §64.5101 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company is in compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. The statement also addresses any (1) actions taken against data brokers, (2) customer complaints received in the past year concerning the unauthorized release of TRS CPNI, and (3) instances where the TRS provider, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the specified procedures.

The company represents and warrants that the certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Executed on February 27, 2015

William Esrey  
Vice President – Sprint Relay  
Sprint Corporation

Attachment: Accompanying statement

**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2014 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

The following statement explains the operating procedures established by Sprint Corporation (f/k/a Sprint Nextel Corporation) ("Sprint" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("FCC" or "Commission") TRS Customer Proprietary Network Information ("TRS CPNI") rules (see 47 C.F.R. §64.5101 *et seq.*).

**Data Brokers**

Sprint did not detect any pretexting activities by data brokers in 2014. Therefore, Sprint did not institute any proceedings or file any petitions against any data broker in any state commission, the court system or the FCC. Sprint continues to deploy safeguards to protect against, detect, and mitigate pretexting activities.

**CPNI Complaints**

Sprint did not receive any complaints in 2014 concerning the unauthorized release of TRS CPNI.

**Use, Disclosure and Access to CPNI**

Sprint did not use, disclose or permit access to TRS CPNI in 2014 without complying with the procedures specified in 47 C.F.R. §64.5101 *et seq.* More specifically, Sprint does 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). As such Sprint does not send notices, or obtain approvals, for the use of TRS CPNI.

**Safeguards**

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, the Company has a variety of training programs for its employees and contractors. The training explains how Sprint employees and contractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. In 2014, the employee completion rate for this training was 100%.

Sprint also maintains a disciplinary process as part of Company 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 independent contractors or joint venture partners, Sprint enters into agreements with strict privacy and confidentiality provisions that require third parties to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews Sprint's standard privacy-related contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires independent contractors and joint venture partners 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 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.

**Notification of Account Changes.**

Sprint provides notice to its customers when a triggering event occurs. Such events include the creation of, or change to, a password, e-mail address or address of record. These notifications are made to the customer's e-mail address of record. The notification includes information to alert the customer of the underlying event, but does not disclose any of the new or changed information, in accordance with the FCC's rules.



**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2014 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

**Notification of CPNI Breaches**

In accordance with the Commission'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 Corporation**  
Mailstop VARESA0209  
12502 Sunrise Valley Drive  
Reston, VA 20196  
Office: (703) 592-7580  
Fax: (703) 433-4084

**Maureen Cooney**  
Head of Privacy  
Office of Privacy  
[Maureen.Cooney@sprint.com](mailto:Maureen.Cooney@sprint.com)

***Electronic Filing via ECFS***

Executed on: February 25, 2016  
Date filed: March 1, 2016

Mr. Greg Hlibok  
Federal Communications Commission  
Disability Rights Office  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: **2015 Annual TRS CPNI Compliance Certification, CG Docket No. 03-123**

Dear Mr. Hlibok:

Attached, for filing in CG Docket No. 03-123, is the annual 47 C.F.R §64.5109(e) TRS CPNI Compliance Certification and accompanying statement of Sprint Corporation.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Respectfully submitted,

  
Maureen Cooney  
Head of Privacy – Office of Privacy  
Sprint Corporation



**Sprint Corporation**  
6360 Sprint Parkway  
Overland Park, KS 66251  
Phone: 913-762-7000  
Fax: 913-523-0302

Michael Fitz  
Vice President – Sprint Wireline  
Michael.Fitz@sprint.com

**2015 Annual 47 C.F.R. §64.5109(e) TRS CPNI Certification  
CG Docket 03-123**

Date Filed: March 1, 2016

Name of company covered by this certification: Sprint Corporation

Name of Signatory: Michael Fitz

Title of Signatory: Vice President – Sprint Wireline

I, Michael Fitz, certify that I am an officer of Sprint Corporation and I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules (see 47 C.F.R. §64.5101 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company is in compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. The statement also addresses any (1) actions taken against data brokers, (2) customer complaints received in the past year concerning the unauthorized release of TRS CPNI, and (3) instances where the TRS provider, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the specified procedures.

The company represents and warrants that the certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Executed on February 25, 2016

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

Michael Fitz  
Vice President – Sprint Wireline  
Sprint Corporation

Attachment: Accompanying statement

**SPRINT CORPORATION  
ATTACHMENT A  
2015 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

The following statement explains the operating procedures established by Sprint Corporation ("Sprint" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("FCC" or "Commission") TRS Customer Proprietary Network Information ("TRS CPNI") rules (see 47 C.F.R. §64.5101 *et seq.*).

**Data Brokers**

Sprint did not detect any pretexting activities by data brokers in 2015. Therefore, Sprint did not institute any proceedings or file any petitions against any data broker in any state commission, the court system or the FCC. Sprint continues to deploy safeguards to protect against, detect, and mitigate pretexting activities.

**CPNI Complaints**

Sprint did not receive any complaints in 2015 concerning the unauthorized release of TRS CPNI.

**Use, Disclosure and Access to CPNI**

Sprint did not use, disclose or permit access to TRS CPNI in 2015 without complying with the procedures specified in 47 C.F.R. §64.5101 *et seq.* More specifically, Sprint does 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). As such Sprint does not send notices, or obtain approvals, for the use of TRS CPNI.

**Safeguards**

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, the Company has a variety of training programs for its employees and contractors. The training explains how Sprint employees and contractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. In 2015, the employee completion rate for this training was 100%.

Sprint also maintains a disciplinary process as part of Company 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 independent contractors or joint venture partners, Sprint enters into agreements with strict privacy and confidentiality provisions that require third parties to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews Sprint's standard privacy-related contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires independent contractors and joint venture partners 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**

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Sprint provides notice to its customers when a triggering event occurs. Such events include the creation of, or change to, a password, e-mail address or address of record. These notifications are made to the customer's e-mail address of record. The notification includes information to alert the customer of the underlying event, but does not disclose any of the new or changed information, in accordance with the FCC's rules.



**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2015 Annual 47 C.F.R. §64.5109(e) TRS CPNI Compliance Statement**

**Notification of CPNI Breaches**

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**Sprint Corporation**  
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Office: (703) 592-7580  
Fax: (703) 433-4084

**Maureen Cooney**  
Head of Privacy  
Office of Privacy  
maureen.cooney@sprint.com

***Electronic Filing via ECFS***

Executed on: February 28, 2018  
Date filed: March 1, 2018

Mr. Greg Hlibok:  
Federal Communications Commission  
Disability Rights Office  
445 12th Street, S.W.  
Washington, DC 20554

Re: **2017 Annual TRS CPNI Compliance Certification, CG Docket No. 03-123**

Dear Mr. Hlibok:

Attached, for filing in CG Docket No. 03-123, is the annual 47 C.F.R. § 64.5109(e) TRS CPNI Compliance Certification and accompanying statement of Sprint Corporation.

If there are any questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Respectfully submitted,

  
Maureen Cooney  
Head of Privacy – Office of Privacy  
Sprint Corporation



**Sprint Corporation**  
6360 Sprint Parkway  
Overland Park, KS 66251  
Office: (913) 762-7000  
Fax: (913) 523-0302

**Michael Fitz**  
Vice President – Sprint Wireline  
michael.fitz@sprint.com

**2017 Annual 47 C.F.R. §64.5109(e) TRS CPNI Certification  
CG Docket 03-123**

Date Filed: March 1, 2018

Name of company covered by this certification: Sprint Corporation

Name of Signatory: Michael Fitz

Title of Signatory: Vice President – Sprint Wireline

**SPRINT CORPORATION  
2017 CPNI COMPLIANCE CERTIFICATE AND STATEMENT**

I, Michael Fitz, certify that I am an officer of Sprint Corporation and I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules (see 47 C.F.R. § 64.5101 *et seq.*).

Attached to this certification is an accompanying statement explaining how the company's operating procedures ensure that the company is in compliance with the requirements set forth in sections 64.5101 through 64.5111 of the Commission's rules. The statement also addresses any (1) actions taken against data brokers, (2) customer complaints received in the past year concerning the unauthorized release of TRS CPNI, and (3) instances where the TRS provider, or its agents, contractors, or subcontractors, used, disclosed, or permitted access to TRS CPNI without complying with the specified procedures.

The company represents and warrants that the certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Executed on February 23, 2018

A handwritten signature in blue ink, appearing to read "Michael Fitz", written over a horizontal line.

Michael Fitz  
Vice President – Sprint Wireline  
Sprint Corporation

Attachment: Accompanying statement

**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2017 Annual 47 C.F.R. § 64.5109(e) TRS CPNI Compliance Statement**

The following statement explains the operating procedures established by Sprint Corporation ("Sprint" or "Company") to ensure that it is in compliance with the Federal Communications Commission's ("FCC" or "Commission") TRS Customer Proprietary Network Information ("TRS CPNI") rules (see 47 C.F.R. § 64.5101 *et seq.*).<sup>1</sup>

**Data Brokers**

Sprint did not detect any pretexting activities by data brokers in 2017. Therefore, Sprint did not institute any proceedings or file any petitions against any data broker in any state commission, the court system or the FCC. Sprint continues to deploy safeguards to protect against, detect, and mitigate pretexting activities.

**CPNI Complaints**

Sprint did not receive any complaints in 2017 concerning the unauthorized release of TRS CPNI.

**Use, Disclosure and Access to CPNI**

Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with the procedures specified in 47 C.F.R. § 64.5101 *et seq.* More specifically, Sprint does 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). As such Sprint does not send notices, or obtain approvals, for the use of TRS CPNI.

**Safeguards**

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, the Company has a variety of training programs for its employees and contractors. The training explains how Sprint employees and contractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. In 2017, all employees and all contractors who had access to CPNI took CPNI training.

Sprint also maintains a disciplinary process as part of Company 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 independent contractors or joint venture partners, Sprint enters into agreements with strict privacy and confidentiality provisions that require third parties to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews Sprint's standard privacy-related contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires independent contractors and joint venture partners 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 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.

**Notification of Account Changes**

Sprint provides notice to its customers when a triggering event occurs. Such events include the creation of, or change to, a password, email address or address of record. These notifications are made to the customer's email address of record. The notification includes information to alert the customer of the underlying event, but does not disclose any of the new or changed information, in accordance with the FCC's rules.

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<sup>1</sup> This certification covers Sprint's traditional TRS and iTRS services.



**SPRINT CORPORATION**  
**ATTACHMENT A**  
**2017 Annual 47 C.F.R. § 64.5109(e) TRS CPNI Compliance Statement**

**Notification of CPNI Breaches**

In accordance with the Commission'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.