



## GOBIERNO DE PUERTO RICO

Junta Reglamentadora de Telecomunicaciones

May 22, 2018

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

### **PUERTO RICO RELAY'S SUPPLEMENTAL INFORMATION FOR FCC CERTIFICATION RENEWAL CG DOCKET NO. 03-123**

Dear Ms. Wilson,

Pursuant to the Commission's (FCC) request, and in representation of Puerto Rico Relay TRS service, the Telecommunications Regulatory Board of Puerto Rico (TRB) hereby submits the following supplemental information, in order to clarify and/or comply with what was requested:

#### **PART 1: 64.604(a)(v) Mandatory Minimum Standards**

##### **What was requested by the FCC:**

For rule requirement 64.604(a)(1)(v), the new requirement states that CAs handling STS calls must stay with the call for a minimum of 20 minutes, opposed to 15 minutes. The application states that you all are still complying to the 15-minute rule, but the matrix in the application states that you all are complying to the 20 minute rule. Can you please provide clarification that Commonwealth of Puerto Rico is in compliance to the 20 minutes rule for STS calls.

##### **TRB's Response to the FCC**

The TRB hereby clarifies that consistent with requirement of 64.604(a)(1)(v), our incumbent TRS contractor, Sprint Accessibility, ensures that CAs answering or placing an STS call, stays with the call for a minimum of twenty (20) minutes.





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### PART 2: COMPLIANCE WITH CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

#### **What was requested by the FCC:**

Section 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. Section 64.5109 states "TRS providers shall have an officer, as an agent of the TRS provider, sign and file with the Commission a compliance certification on an annual basis". We have received the compliance certification from Sprint every year, but we also need a compliance certification from the Commonwealth of Puerto certifying that it is complying to all the requirements of the CPNI rules that are now TRS mandatory minimum standards.

#### **TRB's Response to the FCC:**

Please refer to attachments A and B, referring to compliance with mandatory rules of CPNI.

I hereby certify that the TRB's Puerto Rico Relay TRS service is in compliance with the rule sections above, as stated in each response. Should you need additional information regarding this matter, please direct any questions to the following e-mail address: [rmiranda@irtpr.pr.gov](mailto:rmiranda@irtpr.pr.gov).

Cordially,

Roberto Miranda Santiago  
Special Aide, Compliance and Statistics, and  
TRB's designated TRS Contract Administrator





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# ATTACHMENT A

## TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO'S STATEMENT OF CPNI COMPLAINT

I, Roberto Miranda Santiago, certify as the TRB's designated TRS contract administrator, that Puerto Rico Relay is in compliance with all requirements of the FCC's Customer Proprietary Network Information (CPNI) mandatory rules. The TRB contracted with Sprint Accessibility (Sprint) to provide TRS in Puerto Rico; and in my experience, I have knowledge that Sprint has established operating procedures that ensure compliance with the FCC's mandatory TRS CPNI rules.

Sprint has complied with filing their own TRS CPNI certification, which includes details on how their procedures ensure compliance with the requirements set forth in the FCC's CPNI rules. Please refer to Attachment B for Sprint's CPNI certification.

I have no knowledge, nor the TRB has received complaints of any instances in the past year in which 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.

Sincerely,

Roberto Miranda Santiago  
TRB's designated TRS Contract Administrator





## ATTACHMENT B

### 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 Puerto Rico's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is Puerto Rico's responsibility to certify Puerto Rico'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 Puerto Rico TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address Puerto Rico's compliance as the Puerto Rico TRS program administrator or the activities of any other contractors that Puerto Rico may use to support the Puerto Rico TRS program. Per the FCC, Puerto Rico 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 Puerto Rico's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

#### **CPNI Complaints**

As Puerto Rico'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 Puerto Rico'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 Puerto Rico'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 Puerto Rico'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.





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As Puerto Rico's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigated 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 Puerto Rico 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 Puerto Rico's contractor.

### **Notification of Account Changes**

Sprint provides notice to Puerto Rico's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within the 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 Puerto Rico TRS CPNI during the certification period.



## Miranda Santiago, Roberto

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**From:** Dana Wilson <Dana.Wilson@fcc.gov>  
**Sent:** Tuesday, May 15, 2018 3:42 PM  
**To:** Miranda Santiago, Roberto  
**Subject:** TRS Recertification Application - Commonwealth of Puerto Rico

Hello Roberto,

Hope all is well.

In reviewing the TRS recertification application, there are a few requirements that requires confirmation of compliance before the FCC grants the TRS recertification:

For rule requirement 64.604(a)(1)(v), the new requirement states that CAs handling STS calls must stay with the call for a minimum of 20 minutes, opposed to 15 minutes. The application states that you all are still complying to the 15 minute rule, but the matrix in the application states that you all are complying to the 20 minute rule. Can you please provide clarification that Commonwealth of Puerto Rico is in compliance to the 20 minutes rule for STS calls.

Section 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. Section 64.5109 states "*TRS providers shall have an officer, as an agent of the TRS provider, sign and file with the Commission a compliance certification on an annual basis*". We have received the compliance certification from Sprint every year, but we also need a compliance certification from the Commonwealth of Puerto certifying that it is complying to all the requirements of the CPNI rules that are now TRS mandatory minimum standards.

Can you please provide a supplemental document (a stand-alone document) certifying to all the issues noted above? Please submit the supplemental document in ECFS under CG Docket No. 03-123, attention: Dana Wilson, along with a courtesy copy of the supplemental document to me via email. Once the supplemental document is received, the TRS recertification application for the Commonwealth of Puerto Rico will be granted.

If you have any questions, please let me know. T

Thank you,

Dana W.