Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: August 9, 2016

Name of company covered by this certification: Lightspeed Telecom

Form 499 Filer ID: 823698

Name of signatory: Susan J. Andrews

Title of signatory: Vice-President

I, Susan J. Andrews, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

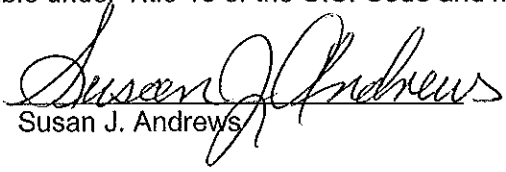
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. *See attached accompanying statement of operating procedures.*

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company did not received any customer complaints in 2012 concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

The company represents and warrants that the above 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.

Signed: 
Susan J. Andrews

Attachment: Accompany Statement explaining CPNI procedures

CUSTOMER PROPRIETARY NETWORK INFORMATION RULES AND POLICIES

The following rules and policies describe Lightspeed Telecom's operating procedures for maintaining a comprehensive customer proprietary network information ("CPNI") program to protect the privacy of our customers pursuant to Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and the FCC's rule 47 C.F.R. § 64.2009(e). These procedures prohibit the sale of telephone call records or the marketing use of such information. The use of customer data for external or internal sales initiatives is prohibited and a disciplinary process is in place to handle any violation of this policy.

"CPNI" is defined as "(A) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."

I. SCOPE

A. Prohibition on Use of CPNI in Marketing

To ensure the protection of the privacy of customer information by prohibiting the unauthorized release of CPNI and to prohibit the external or internal sale of telephone call records. Under no circumstances shall the customer databases associated with Lightspeed's telephone system be utilized for marketing activities.

B. Policies With Respect to Customer Access (protections against pretexting)

- Lightspeed shall not release CPNI to customers during customer-initiated telephone contact except when the customer provides a password.

  a) If a customer does not provide a password, Lightspeed may release call detail information by sending it to an address of record or,
  b) by calling the customer at the telephone of record.

- Lightspeed shall provide mandatory password protection for online account access.
- Lightspeed may provide CPNI to customers based on in-store contact with a valid photo ID.
- Lightspeed shall notify the customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

II. COMPLIANCE OFFICER

Susan J. Andrews, has been appointed as the CPNI Compliance Officer, and can be reached at (618)548-8484 or sandrews@ussonet.net. All requests for CPNI data shall be referred to the CPNI Compliance Officer.

III. PROCEDURES

Upon receipt of a third-party request for customer call records or other CPNI data that is not initiated by the customer with verified password information:

- The employee receiving the request shall notify the Compliance Officer.
- The Compliance Officer shall log the request with approved/denied status.
- Only requests associated with a legal court order shall be approved/released. An accompanying letter must indicate that released information will not be used for marketing activities.
- Failure to follow the above procedure shall result in disciplinary action.

IV. REQUIREMENTS UPON DISCOVERY OF UNAUTHORIZED DISCLOSURE

The following process shall be followed upon discrovery that unauthorized disclosure of CPNI, in any form, has occurred.

- The Compliance Officer shall notify the FCCs Enforcement Bureau, Telecommunications Consumers Division by telephone within 24 hours of such discovery.
- The Compliance Officer shall notify the effected customers by telephone as soon possible, but no later than 24 hours after such discovery.
- The Compliance Officer shall notify local law enforcement within 24 hours of discovery of unauthorized access to CPNI.
- The Compliance Officer shall provide written notice to the FCC's Enforcement Bureau Telecommunications Consumers Division, 445 12th Street, S.W., Washington, D.C. 20554, no later than 7 days after such discovery.

V. TRAINING

All Customer Service, Sales, and Marketing employees shall receive CPNI training on annual basis.

VI. RECORD KEEPING

A written record of all requests for, and complaints regarding, CPNI shall be maintained for a minimum of one year. An Officer of Lightspeed shall provide a compliance certificate to the FCC by March 1 of each year documenting compliancy with this program and records of requests or complaints, as well as information with respect to proceedings against data brokers and pretexters.