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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: February 23, 2015
2. Name of company covered by this certification: Oak Run Associates Ltd. d/b/a DECCA Cable
3. Name of signatory: Carol Olson
4. Title of signatory: Vice President of Administration
5. Certification:

I, Carol Olson, certify that I am an officer of Oak Run Associates Ltd. d/b/a DECCA Cable ("DECCA"), and, acting as an agent of DECCA, that I have personal knowledge that DECCA has established operating procedures, as summarized in the attached statement, that are adequate to ensure compliance with the customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how DECCA' procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq*. of the Commission's rules.

DECCA has not received any customer complaints in the past calendar year or any prior year concerning unauthorized release of CPNI. DECCA does not have any material information with respect to the processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115. DECCA has therefore not taken any actions in the past year or any prior year against data brokers, including proceedings instituted or petitions filed by the company at either the Florida Public Service Commission, the court system, or the Commission.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject DECCA to enforcement actions.

Carol Olson

Carol Olson
Vice President of Administration
Oak Run Associates Ltd.
d/b/a DECCA Cable
Executed February 20, 2015

CPNI Compliance Policies of DECCA Cable

The following summary describes the policies of Oak Run Associates, Ltd. d/b/a DECCA Cable ("DECCA") that are designed to protect the confidentiality of Customer Proprietary Network Information ("CPNI") and to assure compliance with the rules of the Federal Communications Commission ("FCC") set forth in 47 C.F.R. Part 64, Subpart U, Section 2001 *et seq*. CPNI is "(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."

These policies are managed by DECCA's CPNI Compliance Manager, Emilio Gonzalez.

I. USE, DISCLOSURE OF, AND ACCESS TO CPNI

DECCA will use, disclose, or permit access to individually identifiable CPNI only in its provision of the communications service from which such information is derived; for services necessary to, or used in, the provision of such communications service, including the publishing of directories; to initiate, render, bill and collect for communications services; to protect the rights or property of DECCA, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services; to provide inside wiring installation, maintenance, or repair services; as required by law; or as expressly authorized by the customer.

DECCA does not use CPNI to market service offerings among the different categories of service, or even within the same category of service, that it provides to subscribers. Although DECCA's current policy is not to use CPNI for marketing, in the event that any employee or agent wishes to use CPNI for marketing or to seek customer approval for such use, such proposed use is subject to a supervisory review process that shall involve the CPNI Compliance Manager. If such use is approved, DECCA shall modify these policies and conduct additional training as needed to assure compliance with the FCC's rules.

DECCA does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

When DECCA receives or obtains proprietary information from another carrier for purposes of providing a telecommunications service, it shall use such information only for such purpose, and shall not use such information for its own marketing efforts.

II. SAFEGUARDS AGAINST DISCLOSURE OF CPNI TO UNAUTHORIZED PARTIES

Above and beyond the specific FCC requirements, DECCA will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. If any employee becomes aware of new methods that are being used or could be used by third parties to attempt to

obtain unauthorized access to CPNI, or of possible changes to DECCA's existing policies that would strengthen protection of CPNI, they should report such information immediately to the CPNI Compliance Manager so that DECCA may evaluate whether existing policies should be supplemented or changed.

A. Online Accounts

When a customer submits a request for new telephone service, they must provide an email address that will serve as an address of record for their telephone account. An email is sent to the new customer's email address of record that includes a unique secure link that can be used to access on-line account through which the customer may obtain or update certain account information.

The customer is initially authenticated through the use of this link. Upon initial entry into the on-line portal through this link, the customer is required to choose a password and a CPNI Authentication Passcode. After the user chooses a password, the authentication link sent to the customer expires and no longer provides entry into the account, which thereafter can only be accessed by correctly providing the login ID and password. The site instructs the user to select a password and Passcode that do not consist of any significant portion of the customer's name, family names, account number, telephone number, street address, zip code, social security number, date of birth, other biographical or account information, or easily guessed words or strings of digits.

A password and/or the CPNI Authentication Passcode may be changed by the user after logging into the online account with the correct login ID and password.

If a customer forgets their password, they may enter their CPNI Authentication Passcode to have their login credentials sent to their address of record. If they have also do not have their CPNI Authentication Passcode, they may only obtain these credentials by contacting company by phone and asking for these credentials to be provided by a return telephone call to the telephone number of record for the account, or sent to the address of record that has been on file for 30 days, or they may visit a Company office and present photo identification that meets the requirements of Section II.B. herein.

B. Inbound Calls to DECCA Requesting CPNI

CSRs may not disclose any CPNI to an inbound caller until the caller's identity has been authenticated.

More stringent protections apply to Call Detail Information (CDI), which includes any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call. Even after a caller has been authenticated under the process above, DECCA does not reveal CDI to an inbound caller. Instead, if an inbound caller requests CDI, the CSR will first encourage them to obtain the information from their online account. If the caller is unable or not interested to

obtain the information from their online account, DECCA may offer to provide the requested CDI by sending the information by mail to a mailing address of record for the account, but only if such address has been on file with DECCA for at least 30 days. Alternatively, a customer may obtain CDI at a DECCA office in accordance with Section II.C below.

C. In-Person Disclosure of CPNI at DECCA Offices

DECCA may disclose a customer's CPNI to an authorized person visiting a DECCA office upon verifying that person's identity through a valid, non-expired government-issued photo ID (such as a driver's license, passport, or comparable ID) matching the customer's account information.

D. Notice of Account Changes

Whenever a password or online account is created or changed, DECCA will provide a notice to a customer address of record. Whenever a postal or e-mail address of record is created or changed, DECCA will send a notice to customer's prior address of record notifying them of the change. The foregoing notifications are not required when the customer initiates service, including the selection of an email address or creation of an online account at service initiation.
Each of the notices provided under this paragraph will not reveal the changed information and will direct the customer to notify DECCA if they did not authorize the change.

III. REPORTING CPNI BREACHES TO LAW ENFORCEMENT

Any DECCA employee that becomes aware of any breaches, suspected breaches or attempted breaches must report such information immediately to the CPNI Compliance Manager. Such information must not be reported or disclosed by any employee to any non-employee, including the potentially affected customer, except in express conformance with the procedures described below. Any employee that fails to report such information will be subject to disciplinary action that may include termination.

It is DECCA's policy that employees should not be discouraged from reporting information about breaches that may have been caused in part by their own actions or omissions. Once a breach has occurred, the most important objective is to attempt to limit the damage to our customers, make any adjustments as needed to prevent a recurrence of the breach, and to alert law enforcement promptly. Therefore, although employees who violate DECCA's CPNI compliance procedures are subject to discipline, the sanctions may be substantially reduced where employees promptly self-report violations if appropriate.

A. Identifying a "Breach"

A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. If an employee has information about an incident and is not certain that the incident would not constitute a breach under this definition, the incident must be reported to the CPNI Compliance Manager.

If a DECCA employee determines that an unauthorized person is attempting to gain access to CPNI but does not succeed at doing so, no breach has occurred. However, the incident must be

reported to DECCA's CPNI Compliance Manager who will determine whether to report the incident to law enforcement and/or take other appropriate action. The CPNI Compliance Manager will determine whether it is appropriate to update DECCA's CPNI policies or training materials in light of any new information; the FCC's rules require DECCA on an ongoing basis to "take reasonable measures to discover and protect against activity that is indicative of pretexting."

B. Notification Procedures

As soon as practicable, and in no event later than seven (7) business days upon learning of a breach, the CPNI Compliance Manager shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) by accessing the following link: https://www.cpnireporting.gov. DECCA's FRN number and password may be required to submit a report. If this link is not responsive, they should contact counsel or the FCC's Enforcement Bureau (202-418-7450) for instructions.

DECCA will not notify customers or disclose a breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided below. (A full business day does not count a business day on which the notice was provided.) Federal law requires compliance with this requirement even if state law requires disclosure.

If DECCA receives no response from law enforcement after the 7th full business day, it must promptly proceed to inform the customers whose CPNI was disclosed of the breach.

DECCA will delay notification to customers or the public upon request of the FBI or USSS. If the CPNI Compliance Manager believes there is a need to disclose a breach sooner, he or she should so indicate in the notification to law enforcement. However, such notification does not itself permit notice to customers; DECCA still may not notify customers sooner unless given clearance to do so from both the USSS and the FBI.

IV. RECORD RETENTION

The CPNI Compliance Manager is responsible for assuring that we maintain for at least two years a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI pursuant to these procedures, and notifications of breaches made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

DECCA maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties or where third parties were allowed access to CPNI. If DECCA later changes its policies to permit the use of CPNI for marketing, it will revise its recordkeeping policies to comply with the Commission's recordkeeping requirements.

DECCA maintains a record of all customer complaints related to their handling of CPNI, and records of DECCA's handling of such complaints, for at least two years. The CPNI Compliance

Manager will assure that all complaints are reviewed and that DECCA considers any necessary changes to its policies or practices to address the concerns raised by such complaints.

DECCA will have an authorized officer, as an agent of DECCA, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that DECCA has established operating procedures that are adequate to ensure its compliance with FCC's CPNI rules. The certificate for each year will be filed with the FCC by the first business day or on after March 1 of the subsequent year, and will be accompanied by a summary or copy of this policy that explains how DECCA's operating procedures ensure that it is in compliance with the FCC's CPNI rules. In addition, the filing must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. Confidential portions of these submissions shall be redacted from the public version of the filing and provided only to the FCC.

V. TRAINING

All employees with access to CPNI receive a copy of DECCA's CPNI policies and are informed that (i) any use or disclosure of CPNI or other act or omission not in compliance with such policies will result in disciplinary action, including the termination of employment where appropriate, and (ii) employees who knowingly facilitate the unauthorized disclosure of a customer's confidential information may be subject to criminal penalties. In addition, DECCA requires CPNI training for all CSRs, personnel at retail offices that may receive requests for CPNI, and marketing personnel.