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February 24, 2015

**Filed Electronically**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Re: EB Docket 06-36

Dear Ms. Dortch:

Pursuant to Commission rule 47 C.F.R. Section 64.2009(e), CenturyLink hereby submits its annual CPNI Certification for 2014 for its affiliates listed on "Exhibit 3" of the attached document.

Please feel free to contact me if you need additional information.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Linda K. Gardner".

Linda K. Gardner

LKG:kmm  
Enclosure

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket No. 06-36**

Annual 64.2009(e) Customer Proprietary Network Information (CPNI) Certification for 2015,  
covering the prior calendar year 2014

Date filed: February 19, 2015

Name of companies covered by this certification:

Form 499 Filer ID: See Exhibit 3

Name of signatory: Shirish Lal

Title of signatory: Chief Marketing Officer

I, Shirish Lal, am an officer of CenturyLink and acting as an agent of that company, and on behalf of the companies identified in Exhibit 3 (collectively CenturyLink), I certify that I have personal knowledge that these companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission (FCC) CPNI rules. See 47 C.F.R. § 64.2001 *et seq.* My personal knowledge is based, in part, on the personal knowledge of those persons who represent to me that their organizations have procedures in place adequate to ensure compliance with the FCC's CPNI rules.

Attached to this certification is an accompanying statement (Exhibit 1) describing how the various companies have established operating procedures that are adequate to ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the FCC's rules.

**Actions Against Data Brokers.** None of the CenturyLink companies took action in 2014 against data brokers either in courts or before regulatory bodies.

**Customer Complaints.** See Exhibit 2.

Signed /s/

  
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[Electronic Signature]

Attachments: Accompanying Statement explaining CPNI procedures, Exhibit 1  
Summary of Customer Complaints, Exhibit 2, CenturyLink Company Names/499  
Filer IDs for CPNI Certification, Exhibit 3

**EXHIBIT 1 TO COMPLIANCE CERTIFICATE**  
**CenturyLink Statement of Operating Procedures**

Below, CenturyLink describes its operating procedures adequate to ensure compliance with the Federal Communications Commission (FCC) Customer Proprietary Network Information (CPNI) rules set forth in 47 C.F.R., Subpart U. The following processes and activities are utilized by CenturyLink prior to its submission of its certification.

1. Leaders of CenturyLink business units that may use CPNI or be involved with sales, marketing, customer care or repair certify to CenturyLink's CPNI Certifying Officer that, based on their personal knowledge, their business and market units have practices and procedures in place adequate to ensure compliance with the FCC's CPNI rules.
2. Apart from such certifications, as part of its standard operating procedures, CenturyLink takes advantage of the expertise and experience of various non-sales and marketing personnel in addressing privacy and CPNI issues. CenturyLink has a Chief Privacy Officer (CPO) within the Legal organization whose duties include advice and counsel on a variety of privacy and CPNI issues. The CPO's team includes an experienced Compliance Manager who is primarily designated to address and counsel on the proper uses of CPNI. In addition, the Information Security group within Product Development and Technology assists with many technical aspects of CPNI protection. Finally, CenturyLink employees interact with senior legal counsel experienced on CPNI matters when legal analysis or advice is required.
3. So that CPNI issues are timely and uniformly resolved across the business, in addition to ad hoc calls held as required, the designated CPNI Compliance Manager conducts regular CPNI conference calls which include the senior CPNI legal counsel. When appropriate, members of the business units, CenturyLink's CPO, or other CenturyLink attorneys will also attend these calls. During these calls, CPNI-related questions are discussed, issues are raised, solutions are reached and action plans established if necessary. In addition, the CPNI Certifying Officer may be consulted or advised of issues as appropriate.
4. The CPO team assists CenturyLink business units as CPNI-related issues or questions arise, including those involved in product development, training, and supervision of marketing campaigns. This cooperative and collaborative cross-discipline approach to CPNI-issues management creates an atmosphere and structure that frames and supports operating procedures adequate to ensure compliance with the FCC's CPNI rules. This ongoing review allows CenturyLink to identify gaps in legacy companies' practices, documentation, and methods and procedures and to reconcile those gaps to craft a single and uniform compliant model for the company.
5. CenturyLink employees receive CPNI training through a variety of mechanisms and programs. The CPNI training program explains CenturyLink's legal obligations regarding the use, storage, protection and disclosure of CPNI and discusses the application of the FCC's rules to the company's operations. New customer care employees receive CPNI training as part of their initial job training. All employees are also provided with one of two versions of annual CPNI training. Employees with direct sales, marketing and product responsibilities receive more-detailed training on the proper use and protection of CPNI than other employees. In addition, tailored training is conducted as needed or

requested by particular work groups to ensure that they more fully understand the requirements as they relate to their particular function.

6. Beyond its formal training, CenturyLink has created CPNI methods and procedures available for employees that are likely to access, use or disclose CPNI. The methods and procedures cover such steps as appropriately authenticating customers, obtaining one-time CPNI use permission, the use of passwords, and any required change notifications. CenturyLink publishes its procedures internally for easy access and consultation and uses those procedures in face-to-face training sessions, as well. Customer care employees have CPNI resources available in their online reference repository and supervisors periodically provide refresher training on the procedures, particularly where a gap or potential area of concern has been identified.
7. CenturyLink takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Customer information is maintained in password protected databases that can only be accessed by authorized employees for appropriate purposes such as responding to customer questions about their service or bill, or to address requests for troubleshooting or repair. CenturyLink performs routine security evaluations and assessments on its systems, including those containing CPNI. Additionally, CenturyLink's Information Security group performs external penetration tests on Internet-facing web portals to ensure proper security. In addition, only those persons with duties that require access to CPNI to perform their job functions are eligible for such access, and access is controlled through centrally managed User IDs and pass codes.
8. CenturyLink has also adopted a Data Breach Incident Response Plan that identifies for employees how to report a suspected breach and the roles and responsibilities for investigating, mitigating, notifying and correcting any breach. Where the reporting of CPNI breaches is required under the FCC-mandated process (i.e., to the Data Breach Reporting portal), CenturyLink's senior CPNI Compliance Manager reviews the facts of the matter; and if, after investigation, determines a breach has occurred, reports the breach. CenturyLink maintains a log of these reports and such log is maintained for at least two years.
9. CenturyLink has adopted disciplinary processes, incorporated into the company's corporate compliance procedures and communicated to employees, to address employee mishandling or misuse of CPNI. Corporate Security, Legal or Human Resources personnel investigate instances of potential improper access to or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, appropriate disciplinary action, ranging from coaching to termination, will follow.
10. CenturyLink's companies that use CPNI for marketing purposes<sup>1</sup> use either the opt-out or opt-in method to obtain customer approval, depending upon the legacy company. For legacy CenturyLink companies, customers are first informed of the opt-out procedures through a CPNI notice sent to new customers and are given a minimum of at least 30 days to opt-out prior to CenturyLink using their CPNI for marketing purposes. CenturyLink sends out biennial opt-out notices to its customer base, the last of which was sent in 2013.

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<sup>1</sup> Savvis, which became known as CenturyLink Technology Solutions on January 21, 2014, does not use CPNI for marketing or any other purpose other than to provide the service to the customer, including the billing and collection for any telecommunications services provided.

Customers are able to opt-out at no cost to them and to change their decision as they choose by contacting the company. There is a 1-800# designed to provide 24x7 access for customers to record their election. An opt-in mechanism is currently used for legacy Qwest customers.

11. The database marketing group generates customer lists for all marketing campaigns. Supervisory review occurs to identify those marketing campaigns that intend to use CPNI to market telecommunications services beyond those that customers currently subscribe to. Records are generated regarding the campaign, including such details as: a description of the campaign (including the proposed dates and campaign purpose), any CPNI that was used and the products or services intended to be offered. Documentation of campaigns is maintained for a year. Use of the CPNI by agents for marketing campaigns is also documented.
12. CenturyLink uses both employees and agents to market and sell its services. When it works through agents, the agents are required to abide by all CPNI regulations, and to have appropriate protections and training in place to ensure the ongoing confidentiality of the CPNI; limit access to persons who have a need to know such information in connection with the performance of the contract; and restrict the use of CPNI solely to the performance of the contract, in connection with the provisioning and marketing of communications related services and products.
13. CenturyLink also makes CPNI available to vendors who market CenturyLink's and their own services when those vendors have proof of authorization from the customer. These vendors generally sell "packages" of products, including telecommunications and information services, and customer premises equipment (CPE).
14. CenturyLink's standard contracts with customers, suppliers and agents treat CPNI as confidential, subject to protection from inappropriate disclosure. Contracts with customers require prior written approval before CPNI can be disclosed to third parties, except to the extent that disclosure is required for the purpose of the agreement or as required by law.
15. CenturyLink's Privacy Policy and associated Frequently Asked Questions (FAQs) also include a lengthy discussion of CPNI, with a link to the FCC's webpage that addresses CPNI and the Commission's rule.

## EXHIBIT 2 TO COMPLIANCE CERTIFICATE

### Summary of CenturyLink Complaints or Incidences Concerning Unauthorized Release of CPNI

In 2014, CenturyLink investigated 2 substantiated complaints from its customers or incidences regarding unauthorized release of their CPNI. After an investigation, these complaints fell into the following categories

- ❖ Complaint or incident based on improper disclosure or potential disclosure of CPNI to unauthorized third-party: 2

**Exhibit 3 TO COMPLIANCE CERTIFICATE**

**CenturyLink Company Names/ 499 Filer IDs for CPNI Certification**

<b>Company Name</b>	<b>499 Filer ID</b>
CenturyTel of Port Aransas, Inc.	804156
CenturyTel of Claiborne, Inc.	804159
CenturyTel of Central Louisiana, LLC	804162
CenturyTel of Mountain Home, Inc.	804165
CenturyTel of North Mississippi, Inc.	804168
CenturyTel of Arkansas, Inc.	804171
CenturyTel of North Louisiana, LLC	804174
CenturyTel of East Louisiana, LLC	804177
CenturyTel of South Arkansas, Inc.	804180
CenturyTel of Southeast Louisiana, LLC	804183
CenturyTel of Evangeline, LLC	804186
CenturyTel of Southwest Louisiana, LLC	804189
CenturyTel of Northwest Louisiana, Inc.	804198
CenturyTel of Odon, Inc.	804192
CenturyTel of Central Indiana, Inc.	804195
CenturyTel of Midwest - Michigan, Inc.	804201
CenturyTel of Wisconsin, LLC	804204
CenturyTel of Southern Wisconsin, LLC	805725
CenturyTel of Fairwater-Brandon-Alto, LLC	803583
CenturyTel of Chester, Inc.	804207
CenturyTel of Idaho, Inc.	804210
CenturyTel of Adamsville, Inc.	804213
CenturyTel of Redfield, Inc.	804216
CenturyTel of Central Arkansas, LLC	820918
CenturyTel of Northwest Arkansas, LLC	803998
Spectra Communications Group, LLC	820461
Telephone USA of Wisconsin, LLC	820906
CenturyTel of Central Wisconsin, LLC	820908
CenturyTel of Michigan, Inc.	804219
CenturyTel of Forestville, LLC	804222
CenturyTel of Larsen-Readfield, LLC	804225
CenturyTel of Monroe County, LLC	804228
CenturyTel of Northwest Wisconsin, LLC	804231
CenturyTel of Colorado, Inc.	804234
CenturyTel of Northern Wisconsin, LLC	804237
CenturyTel of the Southwest, Inc.	817886
CenturyTel of Ooltewah-Collegedale, Inc.	804246
CenturyTel of Ohio, Inc.	804249
CenturyTel of Chatham, LLC	804252
CenturyTel of San Marcos, Inc.	804255
CenturyTel of Northern Michigan, Inc.	804256

CenturyTel of Lake Dallas, Inc.	802890
CenturyTel of Ringgold, LLC	804759
CenturyTel of Washington, Inc.	806259
CenturyTel of Inter-Island, Inc.	806260
CenturyTel of Cowiche, Inc.	807099
CenturyTel of Eastern Oregon, Inc.	806263
CenturyTel of Oregon, Inc.	806262
CenturyTel of Montana, Inc.	806265
CenturyTel of the Gem State, Inc.	817854
CenturyTel of Eagle, Inc.	806277
CenturyTel of Wyoming, Inc.	806274
CenturyTel of the Midwest - Wisconsin, LLC	817862
CenturyTel of the Midwest - Kendall, LLC	801408
CenturyTel of Upper Michigan, Inc.	815632
CenturyTel of Minnesota, Inc.	805554
CenturyTel of Postville, Inc.	805557
CenturyTel of Alabama, LLC	822566
CenturyTel of Missouri, LLC	822568
Gallatin River Communications, L.L.C.	818006
Gulf Telephone Company	802182
Coastal Utilities, Inc.	808152
Mebtel, Inc.	802263
CenturyTel Acquisition LLC (formerly CenturyTel Solutions II, LLC) *	825564
CenturyTel Fiber Company II, LLC (Lightcore)*	823352
CenturyTel Long Distance, LLC*	818150
Gulf Long Distance LLC*	802281
Coastal Long Distance Services LLC*	809134
Madison River Communications, LLC*	820646
CenturyTel Solutions, LLC*	819995
Embarq Corporation	822076
Embarq Communications, Inc.*	825591
Embarq Payphone Services, Inc.	820698
The El Paso County Telephone Company	807684
Qwest LD Corp*	822734
Qwest Corporation	808440
CenturyLink Communications, LLC	808882
Savvis Communications Corporation	823962

\* Merged with CenturyLink Communications, LLC on 4.1.2014, Filer ID 808882