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February 27, 2015

Mr. Gregory Hlibok, Chief  
Disability Rights Office  
Consumer and Governmental Affairs Bureau  
Federal Communications Commission  
445 12 Street, SW  
Washington, D.C. 20554

Re: TRS Customer Proprietary Network Information (CPNI)  
Annual Compliance Certification (2014)  
CG Docket No. 03-123

Dear Mr. Hlibok:

Attached for filing in this docket are AT&T's annual officer certification of compliance with the Federal Communications Commission's customer proprietary network information (CPNI) rules applicable to Telecommunications Relay Service providers and all other information required by Commission rule section 64.5109(e).

Please call me at (202) 457-2043 if you have any questions.

Sincerely,

/s/Vonda T. Long-Dillard

Cc Susan Kimmel, Deputy Chief

*Attachments*

**AT&T Officer  
CPNI Certification  
Calendar Year 2014**

Date: 2/18/15

1. I, Carmen Nava, Senior Vice President—Customer Experience and Business Planning, AT&T Services, Inc., certifies, based upon my own personal knowledge and/or the personal knowledge of subject matter experts within my organization upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.5109(e), I certify that as of December 31, 2014, AT&T has established safeguards and operating procedures adequate to ensure compliance with the FCC's CPNI rules applicable to telecommunications relay service, as set forth in Part 64, Subpart EE-Customer Proprietary Network Information, of the FCC's rules, 47 C.F.R. §64.5101 *et. seq.* ("TRS CPNI Rules").

3. The attached explanatory statement explains the manner in which AT&T has complied and will continue to comply with those TRS CPNI rules.

Signature: Carmen P. Nava

## EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2014 OF AT&T

This statement summarizes and explains the operating procedures established and implemented by AT&T to comply with the FCC's customer proprietary network information (CPNI) rules applicable to telecommunications relay services (TRS), as provided in Part 64, Subpart EE of the FCC's rules and how these operating procedures ensure compliance with those TRS CPNI rules.

**A. CPNI Restrictions.** AT&T has:

1. Established and distributed procedures whereby AT&T personnel are prohibited from using, disclosing or accessing a relay customer's CPNI for the marketing of other forms of relay services or other AT&T services. AT&T does not engage in any sales or marketing campaigns using relay customers' CPNI. Further, AT&T does not disclose to third parties or permit third party access to relay customers' CPNI except as authorized by the FCC's TRS CPNI rules to provide relay services.

2. AT&T uses, discloses and permits access to CPNI only to the extent allowed by the TRS CPNI rules to handle and facilitate relay calls, including 911/e911 calls, as requested by the administrator of the TRS Fund or the FCC, to protect AT&T's property, and to protect against fraud and unlawful use of relay services. AT&T does not allow telephonic, online or in-store access to TRS CPNI.

3. By following these procedures, AT&T ensures that it does not (a) use, disclose, or permit access to a relay customer's CPNI for the purpose of marketing to that customer any category of TRS offerings for which AT&T is not already the relay customer's provider, or (b) identify or track the CPNI of any relay customer that makes relay calls using a competing TRS provider or use, disclose, or permit access to CPNI as it relates to the use of a competing TRS provider.

4. If AT&T personnel or contractor's should need to use, disclose or access a relay customer's CPNI for any other reason than stated in this statement, they are to advise a supervisor or AT&T's TRS Compliance Officer prior to the use, disclosure or access to ensure that the appropriate process is in place to verify the status of a customer's CPNI approval, obtain any required CPNI approval, and otherwise comply with the FCC's TRS CPNI Rules.

5. AT&T retains Hamilton Relay Inc. ("Hamilton") to provide Spanish relay service and CapTel<sup>®</sup> Telephone, Inc. ("CTI") to provide Captioned Telephone Service ("CTS"). AT&T's

contracts with Hamilton and CTI contain strict privacy and confidentiality provisions that require third parties to maintain confidentiality, protect relay customers' information, comply with all laws, including the TRS CPNI regulations, and conduct themselves in an ethical manner.

**B. Training and Discipline: AT&T:**

1. Requires all AT&T personnel to complete general training that incorporates the treatment of CPNI and CPNI specific training. Upon request, the appropriate AT&T personnel would also answer any CPNI specific questions by e-mail message, one-on-one discussion, general employee communication, refresher training, or other less formal education methods, though no such requests have been made thus far.

2. AT&T maintains a policy and incorporates that policy into a Compliance Manual of requiring compliance with the TRS CPNI Rules. All AT&T employees are also required to review, on an annual basis, AT&T's Code of Business Conduct, which contains general CPNI information.

3. Any AT&T TRS employee that fails to comply with the TRS CPNI Rules or AT&T's Code of Business Conduct is subject to disciplinary action up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by a Hamilton<sup>®</sup> and CTI employee to comply with the TRS CPNI Rules subjects the employee to removal from AT&T's program depending on the severity of the non-compliance. Hamilton and CTI are also subject to contract termination for their repeated failure to comply with the law, including the TRS CPNI Rules.

**C. CPNI Complaints and Breaches:**

1. AT&T retains a log of all customer complaints pertaining to relay services, including those pertaining to the unauthorized use, access to, disclosure or release of CPNI. In 2014, AT&T did not receive any complaints pertaining to the unauthorized use, access to, disclosure or release of CPNI.

2. In 2014, AT&T also experienced no incidents involving the unauthorized release of CPNI or a data breach involving CPNI. If AT&T becomes aware of any incidents involving the unauthorized release of CPNI or a data breach involving CPNI, it will comply with the notice requirements in FCC Rule Section 64.5111. AT&T also does not use data brokers and has not taken any action against any data brokers.

**D. Corrective Processes.** AT&T has corrective processes in place to detect and cure potential deficiencies in the implementation and maintenance of its CPNI procedures. To the extent AT&T discovers or is made aware of an error, AT&T will investigate the cause of the error, fix the error, and, if necessary, update its procedures and provide additional training to prevent a reoccurrence.