

February 27, 2015

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014

Date filed: February 27, 2015

Name of Company covered by this certification: /LflL#(Q

~\$" ") #Zf(Z# + ~~~ and affiliates

Form 499 Filer ID: 1. O/OO

Name of signatory: "fl' L' ' , . 8 %fB

Title of signatory: ~ ° I

Dear Ms. Dortch:

I, "fl' L' ' , . 8 %fB, 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 Customer Proprietary Network Information ("CPNI") rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is a compliance statement explaining how the company's 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.

The company has not taken actions (i.e., proceedings instituted or petitions filed by at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

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.

If any further information is required, please contact me or our regulatory counsel Kristopher Twomey at 202 681-1850 or by email at kris@lokt.net.

Sincerely,



James D. Krupiarz
Chief Financial Officer

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) (“EPIC CPNI Order”),¹ ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ and affiliated entities makes the following statement:

~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has established policies and procedures to comply with the Federal Communications Commission's (“FCC”) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ is compliant with the FCC’s customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~’s policies and procedures designed to safeguard CPNI.

~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ is engaged in training their personnel as to when they are and are not authorized to use CPNI, and ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has an express disciplinary process in place.

~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has established procedures to verify an incoming caller's identity. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in Company’s CPNI Manual. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ also limits the number of employees that have access to customer information and call data.

~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ has implemented measures to discover and to protect against unauthorized attempts to access CPNI. ~~Verizon Wireless~~ ~~Verizon Wireless~~ ~~Verizon Wireless~~ also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify

¹ 47 C.F.R. S: 64.2009(e) states: “A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier 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. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.”

