

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 27, 2015
2. Name of companies covered by this certification:
The Telephone Connection of Los Angeles, Inc.
3. Form 499 Filer ID: 819856
4. Name of signatory: Marc O’Krent
5. Title of signatory: President
6. Certification

I, Marc O’Krent, certify that I am an officer of The Telephone Connection of Los Angeles, Inc. and acting as an agent of such company, that I have personal knowledge that The Telephone Connection of Los Angeles, Inc. 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 Telephone Connection of Los Angeles, Inc’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 Telephone Connection of Los Angeles has not taken any actions against data brokers in the past year.

The Telephone Connection of Los Angeles, Inc. has not received any customer complaints in the past year concerning the unauthorized release of CPNI .

The Telephone Connection of Los Angeles, Inc. 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 Telephone Connection of Los Angeles, Inc. also acknowledges that false statements and misrepresentations to the Commission are punishable under Title18 of the U.S. Code and may subject it to enforcement action.

Signed: 
Marc O’Krent, President
The Telephone Connection of Los Angeles, Inc

Attachments: Accompanying Statement explaining CPNI procedures

THE TELEPHONE CONNECTION OF LOS ANGELES, INC.
STATEMENT OF CPNI COMPLIANCE PROCEDURES

The Telephone Connection of Los Angeles, Inc. (“TTC” or the “Company”) provides paging services to business customers located in California.

When required, TTC has a policy of providing regular written CPNI notices to all customers and obtains approval from all customers to use CPNI for marketing purposes that require customer approval. For such CPNI use, TTC also provides existing customers with the ability to change or rescind their consent to the Company’s use of their CPNI at any time. If applicable, TTC’s CPNI notices explain the customers’ CPNI rights in accordance with the FCC’s CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from TTC that is based upon the Company’s use of their CPNI. If TTC uses CPNI to market communications-related services outside of those services to which a customer already subscribes, it only will do so if the customer has granted approval pursuant to instructions in the CPNI notices. TTC maintains records of customer approval and the delivery of its CPNI notices, if any, for at least two years.

TTC has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use or disclosure of that customer’s CPNI where customer approval is required. Specifically, TTC has a database that can be used for tracking CPNI restricted accounts. Unless, as discussed below, a one-time approval of CPNI is obtained, TTC representatives who market using CPNI in a manner that requires approval, review this database and refrain from marketing to customers with a CPNI restricted account.

Currently, the Company does not use, disclose or permit access to CPNI for marketing purposes other than for the purpose of providing service offerings for the type of services to which the Company’s customers already subscribe. The Company is therefore not required to seek approval from existing customers to use their CPNI and does not maintain a record of a customer’s approval to use CPNI. In the event the Company changes its marketing practices or expands its service offerings so that customer approval is required, it will implement a system by which customers will be notified of such use and the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI. Furthermore, the Company does not share, sell, lease and otherwise provide CPNI to any of affiliates, suppliers, vendors and any other third parties for the purposes of marketing any services.

In accordance with the CPNI rules, upon obtaining a customer’s oral authorization, TTC’s customer service representatives may access a customer’s CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each TTC representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

TTC may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of the Company’s other

users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

The Company has established procedures to require a password prior to disclosing call detail information or other CPNI to a customer during a customer-initiated call. Similarly, the Company has a password requirement for online account access. The Company also will provide call detail information to a customer by mailing such information to the address of record or calling the telephone number of record upon customer request or if the customer is unable to present a proper password. Lastly, the Company will provide call detail information to a customer at a retail location upon presentation of a valid photo ID that matches the name on the account.

The Company has procedures for customer establishment of a password without the use of readily available biographical information or account information. The Company also has procedures for notifying the customer whenever a password, customer response to a back-up means of notification, online account, or address of record is created or changed.

The Company has established procedures for notifying the United States Secret Service (USS) and the Federal Bureau of Investigation (FBI) in the event of a breach of CPNI protection within seven days of reasonably determining that there has been a breach. Customer notification shall be delayed for a minimum of seven full business days after notification to the USSS and the FBI. TTC has established procedures for maintaining records of such breaches for a minimum of two years.

The Company does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services.

The Company maintains a record for at least one year of its sales and marketing campaigns that use customers' CPNI. The Company has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review by the Company's senior marketing personnel who are responsible for approving any proposed outbound marketing requests that would require customer approval. Additionally, the Company's marketing supervisors monitor customer calls from time-to-time to assure that customer accounts and information are being accessed properly by the employees and consistent with the Company's CPNI policies.

All TTC employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation. Moreover, a summary of the Company's CPNI policies are included in the Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All of the Company's employees are required to maintain the confidentiality of all information, including all customer

information (which includes CPNI) that is obtained as a result of their employment by the Company. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

The Company has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms does not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) the Company's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether the Company has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. TTC will submit the above letter even if it offers other methods by which its customers may opt-out.