

Customer Proprietary Network Information Protection

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CTIA – The Wireless Association®

Presentation to Ian Dillner

Office of Commissioner Deborah
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Nature of the Problem

- In the competitive wireless industry, carriers have every incentive to protect their customers' records.
- Lax carrier security is not the problem.
- The problem lies with the pretexters.
- By the time the pretexter has enough information to contact a carrier, to the carrier, the pretexter legitimately appears to be the customer.
- Increased enforcement of existing laws against data brokers is necessary, combined with reasonable protective steps by carriers.
- CTIA's proposals are measured and responsive to the underlying problem of pretexting.

CTIA Supports Consumer Protection Measures

- CTIA supports consumer protection measures that focus on education and pretexting prevention.
 - A requirement that all carriers make optional passwords available to customers for account access.
 - Changes to carriers' annual CPNI certification to include a showing of security procedures and training designed to reduce CPNI disclosures.
 - A prohibition on disclosure of customers' Social Security numbers, names, addresses or credit card numbers on all inbound customer service calls.
 - A requirement that carriers publish their privacy policies to inform consumers of the availability of password protection and other security measures.
 - CTIA Consumer Code for Wireless Service.

EPIC's Proposals Fail to Address the Cause of CPNI Disclosure

- Enforcing encryption of carriers' CPNI and limiting data retention are not supported by claims of insecure carrier databases and will not solve the pretexting problem.
- Requiring carriers to implement an opt-in scheme for disclosure of CPNI to joint venture partners and independent contractors similarly is a solution to a non-problem.
- Audit trails will place heavy administrative burdens on carriers and have little to no effect on CPNI disclosure due to pretexting.