**CABLEVISION**

February 28, 2008

**VIA ELECTRONIC FILING**

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

**Re: Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing in the above-referenced docket, please find the annual CPNI compliance certification of Cablevision VoIP, LLC. prepared in accordance with section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. § 64.2009(e).

Please direct any questions regarding this filing to the undersigned at 516-803-4813.

Respectfully submitted,

Jennifer V. Koester
Senior Counsel
Cable & Communications

cc: FCC EB, Telecommunications Consumers Division
Best Copy and Printing, Inc.

**Cablevision VoIP, LLC**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for the period from December 8, 2007 to December 31, 2007.[1]

Name of Company: Cablevision VoIP, LLC

Form 499 Filer ID: 825973

Name of Signatory: Kathleen Mayo

Title of Signatory: Executive Vice President, Consumer Operations, Cable and Communications

I, Kathleen Mayo, certify that I am an officer of the company named above ("Company"), 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 Federal Communications Commission's ("Commission's) Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the Company's procedures during the above-referenced certification period ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers during the above-referenced certification period. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's operating procedures for compliance with the Commission's CPNI rules. The Company has not received any customer complaints concerning the unauthorized release of CPNI during the above-referenced certification period.

This certification is made to the best of my knowledge, information and belief.

**Signed:** Kathleen Mayo

**Dated:** February 28, 2008

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[1] Cablevision is an interconnected Voice-over-Internet Protocol ("VoIP") provider. Compliance with the Commission's CPNI rules for interconnected VoIP providers became effective December 8, 2007.

**STATEMENT REGARDING OPERATING PROCEDURES**
**IMPLEMENTING 47 C.F.R. SUBPART U**
**GOVERNING USE OF**
**CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

Cablevision VoIP, LLC ("Company" or "Cablevision") is committed to protecting the privacy of its customers' confidential and proprietary information and has established operating procedures to protect CPNI. The following statement explains the operating procedures of the Company to ensure that it is in compliance with the CPNI rules of the Federal Communications Commission ("Commission" or "FCC").

**Use of CPNI**

1. The Company uses CPNI for the purpose of providing a customer with the requested service. The Company also uses CPNI for various purposes permitted by law. For example, the Company may use, disclose or permit access to CPNI:

a. to initiate, render, bill, and collect for its Voice-over-Internet Protocol ("VoIP") services.
b. to protect the rights or property of the Company, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
c. to provide inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call is initiated by the customer and the customer approves of the use of such CPNI to provide such service.
d. for purpose of providing carrier premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion,
e. for the provision of inside wiring, installation, maintenance, repair services, and
f. to market services formerly known as adjunct 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 ID, call forwarding and certain Centrex features.

2. In the event that the Company uses CPNI for sales or marketing , the Company will use CPNI for the purpose of marketing service offerings among the categories of service to which the customer already subscribes from Cablevision. The Company does not use, disclose, or permit access to CPNI to market service offerings that are within a category of service to which the subscriber does not already subscribe from Cablevision, unless the Company obtains proper customer approval in accordance with Commission rules and regulations.

**Protection of CPNI**

3. The Company does not provide Call Detail Record ("CDR") information over the telephone to customers who contact the Company. However, if a customer properly identifies a call, the Company may assist the customer with regard to that particular call and will not release any other CDR information. The Company provides non-CDR information over the telephone to customers who are properly verified by the Company

4. The Company does not provide access to CPNI online unless the customer provides a valid password. In order to establish a password, the Company authenticates the customer without reliance on readily available biographical information or account information. If a Customer forgets the password, the customer must contact Cablevision Customer Service. Customer Service will authenticate the customer without reliance on readily available biographical information or account information and reset the password.

5. The Company will provide certain CPNI information at retail locations provided the customer can provide a valid government-issued photo identification matching the customer's account information.

**Law Enforcement and Required Disclosures**

6. The Company notifies a customer of certain account changes, including whenever a password, customer response to a security question means of authentication, or electronic Address of Record is created or changed. However, notification will not be sent when a Customer initiates service. The notification is sent by electronic mail to the Address of Record or by mail to the Address of Record, as to reasonably ensure that the customer receives the notification. The notification does not provide the updated information.

7. Cablevision must disclose outgoing CDR CPNI upon affirmative written request by the Customer to any person designated by the Customer. The Customer's written request will be verified by the Company. All written requests or subpoenas for CPNI are processed by the Company's Corporate Compliance Department.

8. Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without customer authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni.

- After 7 days of USSS and FBI notice, if Cablevision has not received written direction from the USSS or FBI, Cablevision will notify the customer of the breach, unless the USSS and FBI have extended the period for such notice.

- For 2 years following USS and FBI notice, Cablevision will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

- If there is a possibility of immediate and irreparable harm, Cablevision may notify the customer immediately after consultation with law enforcement.

**Training, Recordkeeping and Enforcement**

9. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

10. In the event that the Company uses CPNI for sales or marketing campaigns, the Company will maintain a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

11. The Company maintains a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review.

12. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.