

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification:

This certification is made by the identified officers of Time Warner Cable Inc. on behalf of TWC Digital Phone LLC and Erie Digital Phone, LLC, both interconnected VoIP providers, and the Time Warner Cable Inc. subsidiaries that are telecommunications carriers subject to the Commission's rules regarding customer proprietary network information ("CPNI") (collectively, the "TWC Covered Entities"). Each of the TWC Covered Entities is identified in Exhibit A, attached hereto.

Form 499 Filer ID:

The Form 499 Filer IDs for the TWC Covered Entities are identified in Exhibit A, attached hereto.

Name and Title of Signatories:

Gerald D. Campbell, Executive Vice President, Technical Operations
Sam Howe, Executive Vice President, Chief Marketing Officer
Kevin MacDermott, Senior Vice President, Commercial Operations

Certification:

I, Gerald D. Campbell, Executive Vice President, Technical Operations of Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

I, Samuel Howe, Executive Vice President, Chief Marketing Officer of Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established operating procedures that are adequate to ensure their compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

I, Kevin MacDermott, Senior Vice President, Commercial Operations of Time Warner Cable Inc., certify that I am an officer of Time Warner Cable Inc., and acting as an agent of the company, that I have personal knowledge that the TWC Covered Entities have established

operating procedures that are adequate to ensure the their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

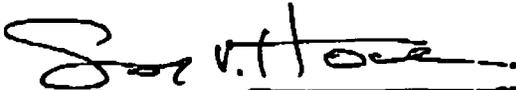
Attached to this certification is a statement explaining how operating procedures of the TWC Covered Entities' ensure that they comply with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Neither Time Warner Cable Inc. nor any of the TWC Covered Entities has taken any actions against data brokers in 2008.

In 2008, the TWC Covered Entities received seventeen (17) customer complaints concerning the unauthorized release of CPNI. Sixteen (16) of these complaints involved unauthorized access to customers' online call detail records, and ten (10) of those sixteen (16) complaints involved unauthorized access to online call detail records by persons who were known to the affected customer. One (1) customer complaint involved a person, known to the customer, falsely presenting the customer's identification and account information in person at a Time Warner Cable Inc. retail location for the purpose of obtaining unauthorized access to the customer's account information, which included CPNI.

Gerald D. Campbell

Dated: _____, 2009



Samuel Howe

Dated: 2.23, 2009



Kevin MacDermott

Dated: 2/26, 2009

operating procedures that are adequate to ensure the their compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is a statement explaining how operating procedures of the TWC Covered Entities' ensure that they comply with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Neither Time Warner Cable Inc. nor any of the TWC Covered Entities has taken any actions against data brokers in 2008.

In 2008, the TWC Covered Entities received seventeen (17) customer complaints concerning the unauthorized release of CPNI. Sixteen (16) of these complaints involved unauthorized access to customers' online call detail records, and ten (10) of those sixteen (16) complaints involved unauthorized access to online call detail records by persons who were known to the affected customer. One (1) customer complaint involved a person, known to the customer, falsely presenting the customer's identification and account information in person at a Time Warner Cable Inc. retail location for the purpose of obtaining unauthorized access to the customer's account information, which included CPNI.



Gerald D. Campbell

Dated: 02-26, 2009

Samuel Howe

Dated: _____, 2009

Kevin MacDermott

Dated: _____, 2009

Statement Regarding Compliance with CPNI Regulations & Report on Unauthorized Disclosure of CPNI

The internal operating procedures and practices of the TWC Covered Entities, as defined in the attached Certification, ensure that the TWC Covered Entities comply with the Commission's rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use and disclosure of Customer Proprietary Network Information ("CPNI"). The TWC Covered Entities' compliance with the Commission's CPNI rules is demonstrated by the policies, practices, and training procedures detailed below.

In connection with the use of CPNI for marketing purposes, the TWC Covered Entities do not use CPNI for the purpose of marketing service offerings that are not within the category of service that the TWC Covered Entities provide to customers. The TWC Covered Entities use CPNI to market service offerings within the same categories of service to which the customer already subscribes. TWC Covered Entities have established a supervisory review and approval process that calls for records of such offerings to be maintained for a minimum of one year.

The TWC Covered Entities release or disclose customer CPNI to third parties only with the customer's written consent, as required by law or as described in the following paragraph. As such, without the customer's written consent, CPNI will be disclosed only if the request is made pursuant to a valid court order, warrant or appropriate notice from a government agency.

Other than as described above, the TWC Covered Entities release or disclose customers' CPNI only for the express limited purpose of initiating, rendering, billing and/or collecting for services rendered by the TWC Covered Entities. In such cases, disclosure is made only pursuant to a written and binding agreement that contains restrictions regarding the confidentiality and safeguarding of customer information.

The customer service representatives of the TWC Covered Entities do not discuss or disclose customers' call detail records on customer initiated telephone calls, except the limited discussion of call detail records after the customer first—without the customer service representative's assistance—identifies and provides specific information about the particular call to be discussed, including the call date, call time, and telephone number called. The TWC Covered Entities accordingly have not established account passwords for telephone access to call detail records. When a customer requests call detail records during a customer initiated telephone call, the TWC Covered Entities provide that information by directing the customer to the TWC Covered Entities' secure online Web portal and/or by mailing the call detail records to the customer's address of record.

The TWC Covered Entities do not provide any access to customers' call detail records or other CPNI via an online web portal until the customer requesting such information provides a password that does not make use of readily available biographical information and that has been established by the customer after he or she has been authenticated in compliance with the Commission's rules. The TWC Covered Entities notify customers immediately whenever a

customer's password, means of authentication, online account or address associated with the account is created or changed.

The TWC Covered Entities do not provide customers with access to CPNI at retail locations unless the customer has presented a valid, government issued photo identification matching the customer's account information.

The TWC Covered Entities provide CPNI to business customers only as described above or, for business customers who have been assigned a dedicated account representative, pursuant to contractual provisions that specifically address the protection of CPNI.

The TWC Covered Entities also employ several internal operating processes and procedures to ensure compliance with the Commission's CPNI regulations. The TWC Covered Entities require that all relevant personnel are informed of and follow company-approved procedures for authenticating customers before disclosing CPNI. The TWC Covered Entities administer an employee disciplinary program to ensure compliance with internal procedures. This program includes penalties for the violation of internal privacy protection procedures, including the potential termination of employees, when appropriate. The TWC Covered Entities have standardized processes for tracking and resolving customer complaints that relate to unauthorized access to CPNI and for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any breaches of customer CPNI. In addition, the TWC Covered Entities have made publicly available materials that inform customers about CPNI protections and the TWC Covered Entities' authentication and protection practices.

Exhibit A

TWC Covered Entities	499 FID
Erie Digital Phone, LLC	826359
Time Warner Cable Information Services (Alabama), LLC	825064
Time Warner Cable Information Services (Arizona), LLC	825739
Time Warner Cable Information Services (California), LLC	824840
Time Warner Cable Information Services (Georgia), LLC	825056
Time Warner Cable Information Services (Hawaii), LLC	825254
Time Warner Cable Information Services (Idaho), LLC	826406
Time Warner Cable Information Services (Indiana), LLC	825060
Time Warner Cable Information Services (Kansas), LLC	824497
Time Warner Cable Information Services (Kentucky), LLC	825738
Time Warner Cable Information Services (Maine), LLC	824084
Time Warner Cable Information Services (Massachusetts), LLC	825252
Time Warner Cable Information Services (Mississippi), LLC	824838
Time Warner Cable Information Services (Missouri) LLC	824496
Time Warner Cable Information Services (Nebraska), LLC	825092
Time Warner Cable Information Services (New Hampshire), LLC	824908
Time Warner Cable Information Services (New Jersey), LLC	825258
Time Warner Cable Information Services (New Mexico), LLC	826407
Time Warner Cable Information Services (North Carolina), LLC	824186
Time Warner Cable Information Services (Ohio), LLC	824836
Time Warner Cable Information Services (Oklahoma), LLC	825062
Time Warner Cable Information Services (Pennsylvania), LLC	825256
Time Warner Cable Information Services (South Carolina), LLC	825090
Time Warner Cable Information Services (Texas), LLC	824184
Time Warner Cable Information Services (Virginia), LLC	826404
Time Warner Cable Information Services (Washington), LLC	826275
Time Warner Cable Information Services (West Virginia), LLC	825058
Time Warner Cable Information Services (Wisconsin), LLC	825088
Time Warner ResCom of New York LLC	819138
TWC Communications, LLC	826652
TWC Digital Phone LLC	826610