

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 25, 2009

Name of company covered by this certification: Korea Telecom America, Inc.

Form 499 Filer ID: 821756

Names and Titles of Signatories:

Taisik Kim, Executive Director
Jongtak Hahn, Vice President

I, Taisik Kim, Executive Director of Korea Telecom America, Inc., 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 CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

I, Jongtak Hahn, Vice President of Korea Telecom America, Inc., 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 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 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 against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Taisik Kim
Executive Director



Jongtak Hahn
Vice President

Dated: February 26, 2009

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

The internal operating procedures and practices of Korea Telecom America, Inc. (“KTA”), which are mandated by its parent company KT Corporation, ensure that KTA complies 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”). KTA’s 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, KTA’s utilization of CPNI is limited to the marketing of offerings among the same categories of service to which the customers already subscribe. KTA has established a review and approval process that calls for the records of such offerings to be maintained.

As a general rule, KTA does not release or disclose customers’ CPNI to third parties, but when it does so, it is only upon the customer’s written consent as required by law or as described in the next paragraph. Without written consent, CPNI will only be disclosed if the request is made pursuant to a valid court order, warrant or appropriate notice from a government agency.

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

The customer service representatives of KTA do not discuss or disclose customers’ call detail records on customer-initiated telephone calls, except for the limited discussion of call detail records first identified by the customer.

KTA does not provide any online access to customers’ CPNI or call detail records until the customer requesting such information provides a password that has been established by the customer after that customer has been authenticated through a method that does not include the use of readily available biographical information. KTA notifies a customer immediately whenever such customer’s password, means of authentication, online account or address associated with the account is created or changed.

KTA does not provide customers with access to call detail records at retail locations because KTA sells only pre-paid calling cards at retail locations.

KTA does not provide customer call detail records to business customers. KTA also employs several internal operating processes and procedures to ensure compliance with KTA privacy policies which are generally in compliance with the Commission’s

CPNI regulations. For instance, KTA has developed extensive and detailed employee training manuals focusing on protecting the privacy of customers. KTA has implemented and administers an employee disciplinary program to ensure compliance with internal procedures. Consequences for non-compliance include the potential termination of employees, when appropriate. KTA has established processes for resolving customer complaints regarding 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, KTA has developed educational materials to inform customers about CPNI protections and KTA's authentication and protection practices.