GENERAL DYNAMICS
C4 Systems

In reply refer to:
LH12-FCC-0001

January 13, 2012

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

Attention: Ms. Marlene H. Dortch

Subject: EB Docket No. 06-36; CPNI Compliance Certification General Dynamics Satellite Communication Services

CC: Best Copy and Printing, Inc. (by email)

Dear Ms. Dortch:

Attached please find the CPNI Compliance Certification of General Dynamics Satellite Communication Services for the calendar year 2011 in accordance with the annual Section 64.2009(e) requirement. If there are any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

General Dynamics Satellite Communication Services

Laurie Heath

Laurie Heath
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **CY 2011**

Date filed: January 13, 2012

Name of company(s) covered by this certification: General Dynamics Satellite Communication Services ("General Dynamics SCS")

Form 499 Filer ID: 821594

Name of signatory: William W. Weiss

Title of signatory: Vice President

I, William Weiss, certify that I am an officer of the company named above ("General Dynamics SCS"), and, acting as an agent of General Dynamics SCS, that I have personal knowledge that General Dynamics SCS 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.

General Dynamics SCS has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. General Dynamics SCS has no information other than that available in the media and from the Commission regarding the processes that pretexters are using to attempt access to CPNI. As described in the accompanying statement, General Dynamics SCS itself has established practices and procedures to protect CPNI.

General Dynamics SCS has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

William Weiss
Vice President
General Dynamics Satellite Communication Services
Date: January 13, 2012

STATEMENT OF CPNI COMPLIANCE PROCEDURES

General Dynamics Satellite Communication Services ("General Dynamics SCS") has established and implemented the following internal policies and procedures that ensure compliance with the requirements Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. §64.201 *et seq*.

The responsibility for General Dynamics SCS's policies and procedures that protect CPNI and guards against its misuse resides with the company's Vice President, who has reviewed Section 222 of the Communications Act and the FCC's CPNI Rules (47 C.F.R. § 64.201 *et seq*.) and is familiar with their requirements.

The following operating procedures ensure that General Dynamics SCS is in compliance with the FCC's CPNI Rules:

1. General Dynamics SCS does not make available to any affiliated or unaffiliated entity information that meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

2. General Dynamics SCS only uses CPNI to render, and bill for, the telecommunications services it provides to its customer. General Dynamics SCS does not use its customers' CPNO for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 *et seq*.

3. General Dynamics SCS has practices and procedures that govern the disclosure of CPNI:

    a. General Dynamics SCS does not disclose or release CPNI upon a customer's telephone request.

    b. General Dynamics SCS does not disclose or release CPNI through online access over the internet.

    c. General Dynamics SCS does not have any retail locations where a customer can obtain CPNI.

    d. With respect to telephone inquiries by customers concerning specific call-related issues, General Dynamics SCS requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.

e. General Dynamics SCS automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.

f. General Dynamics SCS is prepared to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

4. General Dynamics SCS provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse.

5. Because General Dynamics SCS does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to do so by customers), it has not implemented either "opt-in" or "opt-out" CPNI approval procedures set forth at Section 64.2007 of the Commission's Rules, 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures set forth at Section 64.2008 of the Commission's Rules, 47 C.F.R. § 64.2008.

6. In the event that General Dynamics SCS in the future plans to utilize CPNI or provide CPNI to other entities other than as described above, it will first provide customers notification of their CPNI rights as required by the Commission's Rules, 47 C.F.R. 64.2008.

7. It is a violation of General Dynamics SCS' policies to disclose CPNI outside of General Dynamics SCS. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

8. Access to CPNI at General Dynamics SCS is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures that prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

9. Strict controls are in place involving responses to law enforcement agencies that serve General Dynamics SCS with valid legal demands, such as court ordered subpoena, for CPNI. General Dynamics SCS will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.