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March 16, 2012

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: Erratum - AT&T Annual CPNI Compliance Certifications Calendar Year
2011; EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, hereby submits an erratum to its annual CPNI compliance certifications for calendar year 2011 (filed March 1, 2012). With this filing, AT&T includes the inadvertently omitted last two sentences of the last paragraph on page 3 of the explanatory statement for David Christopher, one of its certifying officers.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachment

**AT&T Inc. CPNI Certification
Calendar Year 2011**

Date: 2/14/2012

1. I, David Christopher, Chief Marketing Officer of Mobility and Consumer Markets hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2011, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures adequate to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in black ink, appearing to read "D. Christopher", written over a horizontal line.

EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2011:
DAVID CHRISTOPHER, CHIEF MARKETING OFFICER—AT&T MOBILITY AND CONSUMER MARKETS

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the Mobility and Consumer Markets Organization (“My Organization”) ensure compliance with the specific requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules. This statement summarizes the procedures and explains how they were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with them. AT&T has established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures. To the extent AT&T discovers or is made aware of an error, AT&T investigates the cause of the error, fixes the error, and, if necessary, updates its methods and procedures and provides additional training to prevent a reoccurrence.

A. Customer CPNI Approvals. To the extent applicable, My Organization has:

1. Established processes and controls preventing the use of, disclosure of, or access to CPNI to market out of category services without customer approval or unless such use, disclosure, or access is permitted under FCC rules. Those processes and controls include the review of list pulls and outbound marketing campaigns to ensure that CPNI rules are followed before the campaigns are launched. Further, the personnel who review the list pulls and outbound marketing campaigns are trained that any approval or disapproval by a customer of the use, disclosure, or access to the customer’s CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. § 64.2005(a) and (b) and § 64.2007(a)(2). Specifically, these processes and controls ensure that no use, disclosure, or access to a customer’s individually identifiable CPNI occurs except where: (1) the customer granted “opt in approval” as defined in 47 C.F.R. § 64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. § 2005; or (3) such use or disclosure was otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. § 64.2007(b).
2. Established processes and controls whereby, prior to any solicitation for customer approval to use, disclose, or permit access to the customer’s CPNI, the customer is notified of

the customer's right to restrict use, disclosure, and access to CPNI. See 47 C.F.R. § 64.2008(a)(1). These processes and controls include the review and approval of any change in content or distribution method for initial CPNI Rights Notifications and Biennial CPNI Rights Notifications. Further, specific job functions have been established within My Organization to manage CPNI, including the development of new processes to comply with any CPNI rule modifications by the FCC. See 47 C.F.R. § 64.2008(a)-(d).

3. Established processes and controls to ensure that toll-free numbers with IVR and voice mail features permitting customers to “opt out” are available 24 hours a day, seven days a week. Those processes and controls include test calls to the toll-free numbers several times a week and robust reporting of opt-out activity that is reviewed on a daily and weekly basis. See 47 C.F.R. § 64.2008(d)(3)(v).

4. Established processes and controls to ensure AT&T agents comply with the FCC's CPNI rules. These processes and controls include an annual notice sent to vendor agents involved in marketing and/or fulfillment of CPNI Rights Notifications and Biennial CPNI Rights Notifications reminding them of their obligations to ensure the confidentiality and proper use of all such information. See 47 C.F.R. § 64.2007(b).

B. Training and Discipline: My Organization:

1. Requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, My Organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods, such as employee communications, refresher training, and meetings. Further, vendors have contractual obligations to follow CPNI regulations and to conduct themselves in an ethical manner, and all AT&T employees are required to review the Code of Business Conduct, which contains information on CPNI compliance, on an annual basis. See 47 C.F.R. § 64.2009(b).

2. AT&T maintains a policy requiring compliance with CPNI rules. Any failure by employees to comply with CPNI rules is subject to disciplinary action, up to and including termination of employment, depending on the severity of the non-compliance. Similarly, any failure by vendor employees to comply with CPNI rules subjects them to removal from AT&T's program depending on the severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. My Organization:

1. Maintains a record, for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered.

See 47 C.F.R. § 64.2009(c).

2. Has established a supervisory review process for all outbound marketing campaigns to ensure all sales and marketing campaigns that propose to use CPNI are reviewed and approved.

All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and require supervisory approval by the Database Marketing group. See 47 C.F.R. § 64.2009(d).

D. Security and Authentication. My Organization has:

1. Established processes and controls to notify the customer when a password, back-up means of authentication for lost or forgotten passwords, an online account, or an address of record is created or changed and to ensure that the content and delivery of such notice is in accordance with 47 C.F.R. § 64.2010(f). See also 47 C.F.R. § 64.2003(b). Specifically, My Organization reacts to triggers from IT systems that notification must be sent. My Organization manages the content and delivery of such notifications and validates by reviewing customer counts, notification types, distribution method and distribution reports from internal and external vendors.

2. Established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as “breach” is defined in 47 C.F.R. § 64.2011(e), are reported to AT&T Asset Protection for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011. My Organization also, at the direction of Regulatory Compliance and Asset Protection, manages the fulfillment of customer breach notifications by mail when such notifications are required.

Your submission has been accepted

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Proceeding

Name	Subject
06-36	CPNI Compliance Certification Annual Filing

Contact Info

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City: Washington
State: DISTRICT OF COLUMBIA
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Details

Type of Filing: OTHER

Document(s)

File Name	Custom Description	Size
3.1.12 CPNI certification submission FINAL.pdf		3 MB

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