



**MICHIGAN NETWORK SERVICES**

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1/29/2013

Marlene H Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Certification of CPNI Filing  
EB Docket No. 06-36

To Whom It May Concern:

Enclosed for electronic filing is Michigan Network Services' annual customer proprietary network information certification under 47 C.F.R. §64.2009(e) in compliance with the Federal Communications Commission's EPIC CPNI Order in CC Docket No. 96-115 and WC Docket No. 04-36 and the Public Notice DA 13-61 in EB Docket No. 06-36.

Please contact me if you have any question regarding this electronic filing.

Sincerely,

A handwritten signature in blue ink that reads "Amanda Robinson". The signature is written in a cursive, flowing style.

Amanda Robinson  
CEO  
**Michigan Network Services**  
P.O. Box 210444  
Auburn Hills, MI 48321

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

1. Date filed: 1/28/2013
2. Name of company(s) covered by this certification: Michigan Network Services, LLC
3. Form 499 Filer ID: 826585
4. Name of signatory: Amanda Robinson
5. Title of signatory: CEO
6. Certification:

I, Amanda Robinson, 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, 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.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Michigan Network Services

Form 499 Filer ID 826585  
CPNI Certification

## STATEMENT

Michigan Network Services ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

1. Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
2. Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
3. Carrier maintains record of its and its affiliates' sales and marketing campaigns that use its customer's CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
4. Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI, and a process ensures that opt-out elections are recorded and followed.
5. Carrier took the following actions against data brokers in 2012 and to the present, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications. **None**
6. The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: **Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system.**
7. The following is a summary of all customer complaints received in 2012 and to the present regarding the unauthorized release of CPNI:

Number of customer complaints Carrier received in 2012 and to the present related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**

Category of Complaint:

0 Number of instances of improper access by employees

0 Number of instances of improper disclosure to individuals not authorized to receive the information.

0 Number of instances of improper access to online information by individuals not authorized to view the information.

0 Number of other instances of improper access or disclosure

Description of instances of improper access or disclosure: **None**

## **Customer Proprietary Network Information (CPNI) Policy**

*Following are the processes and procedures as implemented by Michigan Network Services to protect Customer Proprietary Network Information (CPNI) as required by the FCC.*

Michigan Network Services customer account information, including information such as call detail records, account balances and transactions, etc., are not released to 3<sup>rd</sup> parties or without proper customer authentication as defined below.

Customer information, such as Caller ID, Caller Name Delivery, Directory Listing information, that is supplied by the customer for public release is not CPNI and therefore is not covered under this CPNI Policy.

### **Customer Call Detail (CDR) Request**

A customer must submit a request for CDR's in writing or via E-mail. The request should contain the following information:

- The name and address of the customer, as listed on the account
- The date(s) and time(s) of the call records being requested. Up to 5 dates may be requested at no charge. Additional charges will apply for requests of more than 5 dates
- The telephone number of the called or calling party, if known
- The requested method for delivery of the CDR's, either pickup at the Michigan Network Services office, or via postal mail to the address as listed in the customer's account. The CDR's cannot be E-mailed or communicated verbally over the phone.
- A brief explanation of why the records are being requested.

Michigan Network Services will provide the CDR's via the method requested by the customer within 10 business days. If the customer is picking up the CDR's at the Michigan Network Services office, they must provide a photo ID at the time of pickup.

### **Non-CDR Customer Information Request**

A customer may request Non-CDR account information, such as account balances, payments, etc., via writing, E-mail, telephone, or in person.

Michigan Network Services will provide the requested information in one of the following manners as directed by the customer:

- Via postal mail to the address as listed in the customer's account
- Customer pick up at the Michigan Network Services office, upon presentation of a photo ID

### **Online CDR and Non-CDR Customer Information**

CDR customer information is not available on-line.

### **Notice of Account Changes**

When a customer initiates a call to Michigan Network Services requesting a change to their account information or password, Michigan Network Services must respond with a notification back to the customer. The notification can be a voice mail or postal mail to the customer's address of record.

Because of this requirement, a customer initiated telephone request to change address information or a password mandates a call back to the phone number of record to confirm the change. Leaving a voice mail is an acceptable confirmation. If the customer does not answer, and there is no voice mail, then a confirmation letter must be sent to the address of record.

### **Distribution of CDR and Non-CDR Customer Information for Marketing Purposes**

Michigan Network Services does not allow the release of CDR and Non-CDR customer information to marketing companies