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February 26, 2013

**By Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, D.C. 20554

**Re: EB Docket No. 06-36  
Annual CPNI Certification for OnStar, LLC**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, enclosed please find OnStar, LLC's annual Customer Proprietary Network Information certification. Please contact me directly with any questions.

Respectfully submitted,

*/s/ Mark W. Brennan*

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Mark W. Brennan  
Associate  
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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 2013 covering the prior calendar year 2012.

1. Date filed: February 26, 2013
2. Name of company covered by this certification: OnStar, LLC ("OnStar" or "company")
3. Form 499 Filer ID: 822794
4. Name of signatory: Alain Genouw
5. Title of signatory: Chief Financial Officer
6. Certification:

I, Alain Genouw, 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.

OnStar has not taken any 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.

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

OnStar 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. OnStar 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: \_\_\_\_\_

  
Alain Genouw  
Chief Financial Officer  
OnStar, LLC  
400 Renaissance Center  
MC482-D39-B-32  
Detroit, MI 48265

Attachments: OnStar, LLC Explanatory Statement Regarding 2012 CPNI Compliance

**OnStar, LLC**  
**Explanatory Statement Regarding 2012 CPNI Compliance**

OnStar, LLC (“OnStar” or “Company”) provides this statement pursuant to 47 C.F.R. § 64.2009(e) of the Commission’s rules to explain how OnStar’s operating procedures are designed to comply with the Commission’s customer proprietary network information (“CPNI”) regulations. As explained below and as stated in the attached certification by Alain Genouw, OnStar is in compliance with the Commission’s CPNI rules as set forth at 47 C.F.R. §§ 64.2001, *et seq.* OnStar is a CMRS reseller, and its “Hands-Free Calling” is a pre-paid service that does not generate, and is not reflected in, customer invoices. OnStar obtains only a limited amount of CPNI that is accessible to and maintained by its underlying facilities-based providers of telecommunications service.

**Compliance Certification**

An officer of OnStar is required to sign and file with the Commission an annual CPNI compliance certification. The certification is based on the personal knowledge of the certifying officer, acquired through personal experience, information, and reasonable inquiry, and states that OnStar has established operating procedures designed to ensure compliance with the Commission’s CPNI rules.

**CPNI Use**

OnStar does not use, disclose, or permit access to CPNI to third parties without customer approval, except as permitted or required by law. Accordingly, the customer notice and associated record-keeping requirements of the Commission’s CPNI rules are not applicable.

**Procedures Designed to Ensure the Privacy and Security of CPNI**

OnStar takes its obligations regarding the privacy and security of CPNI seriously and has implemented reasonable measures and controls to ensure compliance with the FCC’s CPNI rules. These measures and controls also are intended to enable OnStar to discover and protect against attempts by third parties to gain unauthorized access to CPNI. OnStar obtains and reviews reports regarding instances in which CPNI has been requested to determine whether any unauthorized breaches have occurred. OnStar also has implemented procedures governing the handling and storage of CPNI. As part of these measures, OnStar limits internal access to CPNI and has adopted procedures for internal investigations and audits to evaluate the security of CPNI data.

Several OnStar employees have responsibilities relating to the handling of privacy and data security issues, including those pertaining to CPNI. These individuals work in concert with other OnStar employees to implement OnStar’s privacy and security policies, which are designed to protect customer information, including CPNI.

In addition to its internal policies which are consistent with the Commission’s CPNI Rules, OnStar has a Privacy Statement available on its website. The Privacy Statement explains how OnStar collects, uses, and shares personal and car-specific information that OnStar obtains

in connection with the services it provides in the United States. The Privacy Statement contains a section on CPNI. A copy of the Privacy Statement is provided to customers and is available on the OnStar web site at [www.onstar.com/web/portal/privacy](http://www.onstar.com/web/portal/privacy).

### **Record Retention for Marketing Campaigns**

OnStar maintains records of sales and marketing campaigns that include permitted uses of CPNI. The records include, among other things, a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. OnStar maintains these records for at least one year. OnStar also has a supervisory review process regarding compliance with the CPNI rules for its outbound marketing campaigns and maintains records of its compliance for at least one year.

### **Customer Authentication**

OnStar requires proper authentication before disclosing CPNI. However, OnStar does not disclose call detail information over the telephone in response to customer-initiated telephone contacts. OnStar requires all requests for call detail information to be in writing, and responds to written requests for call detail information and other CPNI by sending a written response to the address of record. Customers must provide a username and password to obtain online account access to CPNI.

### **Employee Training and Discipline**

OnStar trains its employees with respect to the FCC's CPNI rules and the appropriate use of CPNI. OnStar employees are required to follow the express written General Motors "Winning With Integrity" code of conduct, which directs employees to understand the legal rules affecting their area of work and to perform assignments consistently with all applicable laws and regulations. Through the application of this code, OnStar employees that handle CPNI are required to be familiar with, and comply with, the FCC's CPNI rules. Employees who violate the code are subject to disciplinary action, up to and including termination.

### **Account Changes**

Whenever a PIN/password, customer response to a back-up means of authentication for a lost or forgotten PIN/password, online account, or address of record is created or changed, OnStar mails a notice to the customer's address of record. Such notices are sent only to an address associated with the customer's account for at least 30 days (except for accounts activated within the last 30 days, in which case the notice is sent to the address provided at the time of account activation). The notices do not reveal the specific changed information.

### **Security Breaches**

In the event of a security breach, OnStar employees who are responsible for security breaches will notify law enforcement of a breach of OnStar customers' CPNI as soon as practicable, but in no event later than seven (7) business days after a reasonable determination has been made that a breach occurred. They will also notify customers of a breach of their CPNI consistent with the FCC's CPNI rules (*e.g.*, no sooner than the eighth business day following

completion of the notice to law enforcement except where such notification can be made sooner as provided for in the FCC's rules). OnStar also may delay notification as required by the FCC's rules when directed to do so by the U.S. Secret Service or the FBI (*e.g.*, in response to a written agency request that OnStar not notify customers for an initial period of up to 30 days, which may be extended further by the agency).

## **Recordkeeping**

OnStar has not experienced any known breaches of CPNI. OnStar will retain records for at least two years relating to all CPNI security breaches, breach notifications made to law enforcement, and breach notifications made to customers.

During the applicable reporting period, OnStar received no customer complaints concerning the unauthorized release of CPNI. If a complaint is made, the complaint will be reported and investigated internally. In addition, OnStar employees will maintain a record of such complaints by category (*e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, and instances of improper access to online information by individuals not authorized), and a summary of such customer complaints will be included in OnStar's annual CPNI certification.

OnStar acquired no information regarding the activities of, nor took any actions against, pretexters or data brokers during the applicable reporting period. If any such information is obtained, or if any such actions are taken, by OnStar against pretexters and data brokers, OnStar will maintain a record of those actions and include an explanation of such actions with its annual CPNI certification.

## **Policy Changes**

Should OnStar change its policies such that the use, disclosure, or permitted access to CPNI requires customer approval, appropriate customer notice (including appropriate opt-out procedures and opt-out failure reporting), recordkeeping, and FCC notification practices will be implemented.