



March 1st, 2013

VIA ELECTRONIC FILING

Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: EB Docket 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

Dear Mrs. Dortch:

On behalf of San Juan Cable, LLC, d/b/a Onelink Communications and n/k/a Liberty Cablevision of Puerto Rico, LLC, pursuant to 47 C.F.R. §64.2009(e), enclosed please find LCPR's annual CPNI compliance certification for calendar year 2012 and an accompanying statement describing LCPR's CPNI compliance policies and procedures.

Sincerely,

John Conrad
AVP Legal
Liberty Cablevision of Puerto Rico, LLC

Enclosures

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

Date filed: **March 1st, 2013**

Name of company covered by this certification: **San Juan Cable, LLC n/k/a Liberty
Cablevision of Puerto Rico, LLC**

Form 499 Filer ID: **826287**

Name of signatory: **John Conrad**

Title of signatory: **AVP Legal**

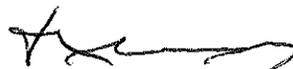
I, John Conrad, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

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 (see attached Accompanying Statement).

The company 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 in the past year. The Company has not received any specific information with respect to any pretexters attempting to use or access CPNI, and the Company has taken the steps established in the operating procedures to protect CPNI.

The company has not received any 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.



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Attachments

c: Enforcement Bureau, Telecommunications Consumers Division
Best Copy & Printing, Inc. via fcc@bcpiweb.com

ACCOMPANYING STATEMENT TO
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
For the period of January 1st until December 31st, 2012

EB Docket 06-36

San Juan Cable, LLC n/k/a Liberty Cablevision of Puerto Rico has established the following operating procedures to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the regulations issued by the Federal Communications Commission (the "Commission") regarding protection of customer proprietary network information ("CPNI").

1. **Employee Training; Supervisory Review Process.** Company personnel are trained to understand what CPNI is and when they are and are not authorized to use or disclose CPBNI. Nevertheless, Company personnel are not permitted to make any decisions regarding use of CPNI without first consulting with a supervisor from the Customer Operations Department. In deciding whether the contemplated use of the CPNI is proper, supervisors consider one or more of the following; the Company's own compliance policies, applicable Commission regulations, and the Commission's Small Entity Compliance Guide regarding CPNI. If necessary, the Company also consults legal counsel.
2. **Application of Disciplinary Policy.** The Company has disciplinary policies and procedures in place, and such policies and procedures are applied to Company personnel who use or disclose CPNI without authorization or in an improper manner.
3. **Customer access to CPNI; Authentication.** The Company does not disclose CPNI to customers (or anyone else over the telephone; if customers want to access CPNI, they must visit the Company in persona and present valid photo identification or sign into their online accounts. These passwords, as well as the procedure used to authenticate a caller's identity if such caller has forgotten his or her password, effectively protect customers' CPNI from "data brokers".
4. **Non-Disclosure of CPNI where Customer Approval Required.** The Company's policy is not to use CPNI, or to disclose CPNI to third parties, for purposes that would require customer approval. If in the future that policy changes, the Company will comply with the notice and consent requirements set forth in the Commission's rules.
5. **Use of CPNI for Permitted Purposes.** The Company may use CPNI, or share CPNI with contractors (acting as agents of the Company), for purposes expressly authorized by Section 222(d) of the Communications act, such as initiating, rendering, and billing and collecting for telecommunications services, as well as engaging in limited inbound telemarketing and administrative services during calls initiated by customers.
6. **Recordkeeping.** The Company maintains the records required by the CPNI rules, to the extent applicable.
7. **Computer System Encryption.** As encouraged by the Commission, the Company has implemented additional CPNI protective measures. All of the Company's computer systems and databases containing CPNI are encrypted to prevent unauthorized access.
8. **Internal Investigation of Attempted "Pre-Texting".** The Company is cognizant of the dangers of "pretexting", and therefore, in the event that the Company detects

attempts by so-called “data brokers” to use pretexting against it or otherwise to access CPNI, the Company will conduct an internal investigation to determine the source of the problem and the most appropriate resolution, which may involve reporting such pretexting activity to the Commission or other applicable governmental authorities.

- 9. Notification of Breach – Law Enforcement and Customers.** In the event that the Company discovers a breach of customers’ CPNI, the Company will report such breach to law enforcement officials and the affected customers in accordance with the Commission’s rules.
- 10. No Customer Complaints during 2012.** The Company has not received any customer complaints with respect to misuse, unauthorized disclosure, or other problems with respect to its handling or protection of CPNI since January 1, 2012.