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February 28, 2014

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Annual CPNI Certification, EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), Verizon, on behalf of the identified operating entities, hereby files its annual certifications of compliance with the Commission's customer proprietary network information rules. Please contact the undersigned should you have any questions.

Sincerely,

Attachments

cc: Best Copy and Printing, Inc. (via e-mail)

ATTACHMENT 1

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

Annual 64.2009(e) CPNI Certification

Date: February 25, 2014

Name of companies covered by this Certification:
Verizon Telematics Inc.

Name of signatory: Mark Smith

Title of signatory: Chief Financial Officer, Verizon Telematics Inc.

I, Mark Smith, certify that I am an officer of Verizon Telematics Inc. and acting as an agent of this company, I have personal knowledge that it has established operating procedures, as described in the attached statement, that, to the best of my knowledge, information and belief, and except as noted in the attached statement, 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 this company's current operating procedures are designed to ensure that it is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Also attached is an explanation of actions, if any, taken against data brokers and a summary of customer complaints received in 2013 concerning the unauthorized release of CPNI.

Signed: _____

Verizon Telematics Inc.
CPNI Statement of Compliance

Section 64.2005 Use of Customer Proprietary Network Information Without Customer Approval

Verizon Telematics Inc. ("VTI") provides telecommunications services to one customer. VTI has not used and does not plan to use CPNI for marketing that requires consent.

Sections 64.2007-8 Approval Required for Use of Customer Proprietary Network Information; Notice Required for Use of Customer Proprietary Network Information

VTI does not use, disclose, or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, VTI does not send notification or request corresponding approval from its customer. VTI does not use joint venture partners or independent contractors to market to its customer.

Section 64.2009 Safeguards Required for Use of Customer Proprietary Network Information

VTI trains appropriate personnel about the CPNI rules and advises that the failure to follow them can be grounds for disciplinary action, up to and including dismissal.

This statement of compliance is preceded by a certificate signed by an officer of VTI, pursuant to section 64.2009(e). An explanation of actions taken against data brokers and a summary of customer complaints involving instances of the unauthorized release of CPNI is attached below.

Although VTI currently does not use, disclose, or permit access to CPNI to market services, if it chooses to change this policy and use CPNI for marketing, it will (1) implement a system by which the status of a customer's CPNI approval can be clearly established, (2) maintain a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI for at least one year, (3) maintain a record of all instances where CPNI was disclosed or provided to third parties for at least one year, (4) require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval, and (5) provide written notice to the FCC within five business days of any instance where its opt-out mechanism did not work properly.

Section 64.2010 Safeguards on the disclosure of customer proprietary network information

VTI has an assigned representative to work with the single customer receiving telecommunications service. The dedicated VTI representative discloses CPNI to the customer through a representative authorized by the customer contractually. VTI does not provide in-store access or online access to CPNI. Whenever a significant account change occurs, VTI immediately notifies the customer of the change at an address of record.

Section 64.2011 Notification of customer proprietary network information security breaches

VTI has implemented procedures to notify law enforcement, and subsequently customers, of CPNI breaches (defined in subsection 64.2011(e)). Internal procedures direct employees to notify the legal department of any potential CPNI breach. When a breach is confirmed, the appropriate personnel are prepared to make the required notifications to the United States Secret Service, the Federal Bureau of Investigation, and the customer. Records of such breaches and the corresponding notifications are maintained for at least two years.

Information Concerning Data Brokers and Complaints of Unauthorized Disclosure

Explanation of Actions Against Data Brokers:[1]

VTI did not take any actions against data brokers in 2013.

Information of Verizon about Processes Used by Pretexters to Access CPNI and VTI Actions in Response to Protect CPNI: [2]

VTI is not aware of any processes used by pretexters not already in the record of the Federal Communications Commission's CPNI docket.

Summary of the Number of Customer Complaints in 2013 Concerning Unauthorized Release of CPNI

A review of allegations revealed no substantiated complaints by customers involving unauthorized access to the customer's CPNI, or unauthorized disclosure of the customer's CPNI:

Number of complaints involving improper access by employees: 0
Number of complaints involving improper disclosure to unauthorized individuals: 0
Number of complaints involving improper online access by unauthorized individuals: 0

[1] Under Commission rules, "actions" are proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or at the Commission against data brokers.

[2] Under Commission rules, carriers must report information that they have with respect to the processes pretexters are using to attempt to access CPNI, and the steps carriers are taking to protect CPNI.

ATTACHMENT 2

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

Annual 64.2009(e) CPNI Certification

Date: February 25 2014

Name of companies covered by this Certification:
Verizon Business Global LLC*
Verizon Hawaii International Inc.
Verizon Select Services Inc.
Verizon Select Services of Virginia Inc.

Name of signatory: Michelle C. Ifill

Title of signatory: Senior Vice President, General Counsel and Secretary or Vice President

I, Michelle C. Ifill, certify that I am an officer of each of the Verizon entities listed above and, acting as an agent of these companies, I have personal knowledge that they have established operating procedures, as described in the attached statement, that, to the best of my knowledge, information and belief, and except as noted in the attached statement, 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 these companies' current operating procedures, as updated since last year's certifications, are designed to ensure that they are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Also attached are (1) an explanation of actions, if any, taken against data brokers, and (2) a summary of customer complaints received in 2013 concerning the unauthorized release of CPNI.

Signed: Michelle C. Ifill

*Verizon Business Global LLC files a consolidated 499 for itself and all other Verizon Business Global LLC licensees not specifically listed.

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

Annual 64.2009(e) CPNI Certification

Date: February 25 2014

Name of companies covered by this Certification:

Verizon New England Inc.
Verizon New York Inc.
Verizon Washington, DC Inc.
Verizon Delaware LLC
Verizon Maryland LLC
Verizon New Jersey Inc.
Verizon Pennsylvania LLC
Verizon Virginia LLC
Verizon California Inc.
Verizon Florida LLC
Verizon North LLC
Verizon South Inc.
GTE Southwest Incorporated d/b/a Verizon Southwest
Verizon Enterprise Solutions LLC
Verizon Long Distance LLC
Verizon Avenue Corp. d/b/a Verizon Enhanced Communities

Name of signatory: John F. Raposa

Title of signatory: Vice President

I, John F. Raposa, certify that I am an officer of each of the Verizon entities listed above and, acting as an agent of these companies, I have personal knowledge that they have established operating procedures, as described in the attached statement, that, to the best of my knowledge, information and belief, and except as noted in the attached statement, 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 these companies' current operating procedures, as updated since last year's certifications, are designed to ensure that they are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Also attached are (1) an explanation of actions, if any, taken against data brokers, and (2) a summary of customer complaints received in 2013 concerning the unauthorized release of CPNI.

Signed: _____

Verizon
CPNI Statement of Compliance

In order to promote ongoing compliance with Section 222 of the Communications Act of 1934 (the "Act") and the Commission's implementing rules (the "CPNI Rules"), Verizon[1] maintains a CPNI compliance program. The program is designed to communicate the CPNI rules and provide detailed information on how to comply with such rules. The Verizon legal organization manages the program and works with Verizon employees on a regular basis to review issues that may arise and to provide advice and guidance.

Section 64.2005 Use of Customer Proprietary Network Information Without Customer Approval

Verizon is a provider of local and long distance telecommunications and interconnected VoIP services to residential, business and government customers. CPNI is used, disclosed or accessed to provide or market Verizon services to customers within the categories of services to which the customer already subscribes, to perform activities authorized under Section 222 of the Act and subsections 64.2005(b)(1), (c) and (d) of the CPNI Rules, and to comply with legal requirements (*e.g.*, lawful process). In addition, CPNI is shared among affiliated entities that provide service offerings to the customer. Verizon does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers.

Section 64.2007 Approval Required for Use of Customer Proprietary Network Information

Verizon obtains opt-out approval from its residential, small business and medium business voice customers to use CPNI to market communications-related services to its customers and to disclose CPNI to its agents and its affiliates for the purpose of marketing communications-related services.[2] With opt-out approval, Verizon also permits these agents and affiliates to access CPNI for such purposes.

Verizon obtains opt-in approval from its large business customers and a portion of its medium business and government customers to use CPNI to market products and services to its customers and to disclose CPNI to its agents, affiliates, contractors and partners for the purpose of marketing products and services. With opt-in approval, Verizon also permits these agents, affiliates, contractors and partners to access CPNI for such purposes.

Under both the opt-in and opt-out procedures, customer approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval. Verizon maintains records of customer approvals and disapprovals for at least one year.

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[1] See list of Verizon entities on the Michelle C. Ifill and John F. Raposa Certifications.

[2] As Verizon previously reported, a subset of consumer, small business and medium business voice customers did not receive notice of Verizon's request for opt-out approval on the initial bill. *See* Notification under Section 64.2009(f) – Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115 (Jan. 18, 2013) ("Verizon Notice").

Verizon obtains one-time approval from its customers to use CPNI during customer service calls, chats, and online ordering and inquiry processes. Customer approval remains in effect only until the call, chat, or online ordering or inquiry process is complete. Verizon maintains records of customer one-time use approvals for one year.

Section 64.2008 Notice Required for Use of Customer Proprietary Network Information

Verizon provides written opt-out notice to its residential, small business and medium business voice customers on a monthly basis.[3] The notice defines CPNI and advises that CPNI may be used and shared with Verizon's affiliates and agents to offer a wide range of communications-related services that may be different from those they already buy from the Verizon family of companies. The notice explains that the customer has the right to opt-out of such use and sharing at any time; and that opting out will not affect provisioning of services to which the customer subscribes. The notice informs customers that the customer has a right, and Verizon has a duty to protect the confidentiality of CPNI. The notice provides customers with a toll-free number to call for CPNI opt-out purposes. This toll free service is available 24 hours a day, seven (7) days a week on a year-round basis. Customers are advised that they can opt-out at any time and that their opt-out status remains in place unless the customer contacts Verizon to change it. Verizon adheres to a minimum 30-day waiting period when providing initial opt-out notices and allows at least three additional days for mailing the initial opt-out notices before using CPNI under opt-out.

Verizon provides written opt-in notice to its large business and a portion of its medium business and government customers when soliciting opt-in approval to use, disclose or permit access to the customers' CPNI. The notice informs the customers of their rights to deny such approval, and provides sufficient information to enable the customers to make informed decisions as to whether to grant or deny the approval requested. The notice includes the following minimum content, although the specific language used to convey it may vary. The notice states that carriers have a duty, and the customer has a right, under federal law to protect the confidentiality of customer CPNI. The notice states that CPNI includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of the telecommunications and interconnected VoIP services the customer purchases from Verizon, as well as related local and toll billing information, made available to Verizon solely by virtue of the customer relationship with Verizon. The notice seeks consent to share customer CPNI among the Verizon affiliates, and with agents and partners, so that all may use it to offer the customer a full range of products and services. The notice states that the customer's decision to consent or refuse consent will remain valid until the customer otherwise advises Verizon, and in either case, will not affect the provision of service to the customer. Opt-in notices state that the customer grants consent by signing but that the customer has the right to refuse consent by sending notice of that refusal in writing to cpni-notices@verizonwireless.com and cpni-notices@verizon.com. The opt-in notice may be provided to the customer as a separate document, or in the customer's service agreement.

Verizon uses a notice to obtain customer approval for limited, one-time use of CPNI for the duration of a customer session. The notice complies with the requirements of this section.

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[3] *See* Verizon Notice.

Section 64.2009 Safeguards Required for Use of Customer Proprietary Network Information

Verizon has implemented systems designed to provide the status of a customer's CPNI approval prior to the use or disclosure of CPNI. When a customer's opt-in or opt-out CPNI election is received, it is recorded in Verizon systems, including the date of receipt. If the customer withdraws approval (including by a subsequent opt-out), the systems are updated to reflect such withdrawal (this does not apply to limited one-time approvals, which expire automatically at the end of the session). Sales, service and marketing personnel can reference the systems whenever needed to determine a customer's current CPNI approval status.

Verizon trains appropriate personnel about the CPNI rules and advises that the failure to follow them can be grounds for disciplinary action, up to and including dismissal. Such training provides instruction on Verizon's practices and procedures for CPNI compliance as well as contact information for CPNI inquiries and concerns. Online CPNI resources provide standard forms as well as methods and procedures on how to properly handle CPNI in certain situations.

Verizon maintains records of all marketing and sales campaigns that use its customers' CPNI, and all instances in which CPNI is disclosed or access is provided to third parties in a marketing or sales campaign. Campaign records include a description of the campaign, the CPNI that was used in the campaign, and the products or services that were offered as part of the campaign. Records are retained for at least one year.

Verizon has a supervisory review process for outbound marketing designed to comply with the CPNI rules. Verizon personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval. Generally, all Verizon outbound marketing is supervised by sales, service and/or marketing department management, as applicable, with the advice of the Verizon legal department. The sales, service and marketing departments also have designated employees to oversee their respective departments' CPNI compliance activities. A dedicated email mailbox is available for employees to obtain guidance on CPNI questions.

Verizon provides written notice to the Commission, within five business days after determination, should a failure of its opt-out mechanism occur that is more than an anomaly. The written notice meets the content requirements identified in this subsection.

This statement of compliance is preceded by a certificate signed by an officer of Verizon, pursuant to section 64.2009(e). An explanation of actions taken against data brokers and a summary of customer complaints involving instances of the unauthorized release of CPNI is attached below.

Section 64.2010 Safeguards on the disclosure of customer proprietary network information

Verizon uses reasonable procedural and technological measures designed to discover and protect against unauthorized CPNI access and comply with this section and applicable law. Verizon reviews and updates these measures periodically. Verizon's operational procedures require that

customers or their representatives be properly authenticated, as required by this section, applicable law, and/or pursuant to contractual terms under the business customer exemption (BCE) in section 64.2010(g),[4] before they are given access to CPNI. Verizon processes and procedures do not allow disclosure of call detail CPNI on inbound calls, except as permitted by law or under the BCE. Verizon will discuss call detail over the phone with a customer during a customer-initiated call if that customer is able to provide the specific call detail to be discussed without assistance from the service representative. Except as permitted by law or under the BCE, Verizon's online procedures do not grant online access to CPNI based on the presentation of readily available biographical or account information and once authenticated, a customer may only obtain online access to CPNI by providing a password. In the event of a lost or forgotten password, Verizon's back-up authentication procedures do not rely on prompts to the customer for readily available biographical or account information. If a customer cannot provide a password or satisfy the back-up authentication process, the customer is denied online access and must be re-authenticated. Verizon's operating procedures require a valid photo ID matching the customer's account information before disclosing CPNI at a retail location and confirmation that the customer provided a valid photo ID is noted in the record of the customer transaction.

Verizon reinforces its procedures through testing and periodic observations, which include providing feedback to representatives when safeguarding processes are not properly followed. Employees also are trained annually on processes regarding proper safeguarding of customer accounts.

Verizon investigates and resolves any reports of potential unauthorized access to or disclosure of CPNI and takes appropriate corrective action as needed to maintain the effectiveness of its procedures and operations.

Verizon has established systems and procedures designed to immediately trigger notification to the affected customer when a password, customer back-up authentication response, online account, or address of record is created or changed, except at service initiation. Such notices do not reveal the changed information and are sent to a customer address of record (as defined by subsection 64.2003(b)) or to the telephone number of record (as defined in subsection 64.2003(q)). These notices are not triggered for customers under the BCE. In July 2012, Verizon entered into a Consent Decree, which provides for additional measures to promote compliance with section 64.2010(f). Verizon has implemented those measures.

Section 64.2011 Notification of customer proprietary network information security breaches

Verizon has implemented procedures to notify law enforcement, and subsequently customers, of CPNI breaches (defined in subsection 64.2011(e)), as required by this section. Internal procedures direct information about possible CPNI breaches to an established CPNI email address routed directly to Verizon security. The information is then made available to a team

[4] Verizon occasionally binds itself contractually to authentication regimes other than those described in Section 64.2010 of the Federal Communications Commission's rules for services provided to certain business customers that have both a dedicated account representative and a contract that specifically addresses its protection of CPNI.

including Verizon security, privacy and legal groups. Such possible breaches are then investigated and handled according to the requirements of this section.

Verizon procedures require that the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") be notified of a CPNI breach through the central reporting facility required under subsection 64.2011(b) as soon as practicable, and in no event more than seven business days after Verizon reasonably determines that the breach has occurred. Customers and the public will not be notified of a CPNI breach during the seven business days after notification has been given to the USSS and FBI, except as permitted under subsections 64.2011(b)(2) in case of extraordinarily urgent need, to avoid immediate and irreparable harm, and after consulting and cooperating with the relevant investigative agency to minimize any adverse effects of the customer notification. If the relevant investigating agency directs Verizon in writing not to disclose to or notify customers or the public of a CPNI breach because such disclosure or notice would impede or compromise an ongoing or potential criminal investigation or national security, as provided by subsection 64.2011(b)(3), Verizon will further delay notifying or disclosing the CPNI breach to customers and the public. After Verizon has completed the process of notifying law enforcement of a CPNI breach, including the required periods of delay noted above, Verizon procedures require that the affected customer be notified of the breach. Records of CPNI breaches, notifications to the USSS and FBI pursuant to subsection 64.2011(b), and notifications to customers, will be maintained for at least two years. Those records will include, if available, the dates the CPNI breach was discovered, the dates that notifications were made, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

Information Concerning Data Brokers and Complaints of Unauthorized Disclosure

Explanation of Actions Against Data Brokers:[5]

Verizon did not take any actions against data brokers in 2013.

Information of Verizon about Processes Used by Pretexters to Access CPNI and Verizon Actions in Response to Protect CPNI:[6]

Verizon is not aware of any processes used by pretexters materially different from what is in the record of the Federal Communications Commission's CPNI docket. The actions Verizon is taking to protect CPNI from pretexters are described in the other parts of this compliance statement.

[5] Under Commission rules, "actions" are proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or at the Commission against data brokers.

[6] Under Commission rules, carriers must report information that they have with respect to the processes pretexters are using to attempt to access CPNI, and the steps carriers are taking to protect CPNI.

Summary of the Number of Customer Complaints in 2013 Concerning Unauthorized Release of CPNI

Verizon's summary of 2013 CPNI complaints by category appears below. A review of allegations revealed 12 substantiated complaints by customers involving unauthorized access to the customer's CPNI, or unauthorized disclosure of the customer's CPNI:

Number of complaints involving improper access by employees: 0
Number of complaints involving improper disclosure to unauthorized individuals: 7
Number of complaints involving improper online access by unauthorized individuals: 5

ATTACHMENT 3

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification

Date: February 24, 2014

Name of company covered by this certification: Cellco Partnership d/b/a Verizon Wireless (see attachment)

Form 499 Filer ID: 822750 (see attachment)

Name of signatory: Brian Danfield

Title of signatory: Vice President, National Sales Operations

I, Brian Danfield, 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. As detailed in the attached statement, the company has commenced no new actions, as that term is defined by the Commission, against data brokers in the past year. In addition, as detailed in the attached statement, the company has received customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____

Attachments: Companies Covered by Annual CPNI Certification of Cellco Partnership
Verizon Wireless Statement of Compliance
Explanation of Actions Taken Against Data Brokers
Summary of Customer Complaints

Companies Covered by Annual CPNI Certification of
Cellco Partnership d/b/a Verizon Wireless[1]

ALLTEL Central Arkansas Cellular Limited Partnership (806208)
ALLTEL Communications, LLC (823790)
ALLTEL Communications of Arkansas RSA 12 Cellular Limited Partnership (806033)
ALLTEL Communications of LaCrosse Limited Partnership (806033)
ALLTEL Communications of North Carolina Limited Partnership (818374)
ALLTEL Communications of Saginaw MSA Limited Partnership (806033)
ALLTEL Northern Arkansas RSA Limited Partnership (806205)
Arkansas RSA #2 (Searcy County) Cellular Limited Partnership (818074)
Badlands Cellular of North Dakota Limited Partnership (805242)
Cellco Partnership d/b/a/ Verizon Wireless (822750)[2]
Charleston-North Charleston MSA Limited Partnership (818424)
Colorado 7 – Saguache Limited Partnership (805200)
Fayetteville MSA Limited Partnership (806222)
Iowa RSA 7 Limited Partnership (804882)
Iowa 8 – Monona Limited Partnership (805215)
Jackson Cellular Telephone Co., Inc. (806033)
Michigan RSA #9 Limited Partnership (806033)
Missouri RSA #15 Limited Partnership (806238)
Missouri RSA 2 Partnership (806226)
Missouri RSA 4 Partnership (806232)
Mohave Cellular Limited Partnership (823712)
New York RSA 2 Cellular Partnership (820293)
Northwest Arkansas RSA Limited Partnership (806254)
Oklahoma RSA No.4 South Partnership (806227)
Pascagoula Cellular Partnership (806033)
Petersburg Cellular Partnership (818432)
RCC Minnesota, Inc. (FRN 0002622934)
Rural Cellular Corporation (815018)
San Isabel Cellular of Colorado Limited Partnership (805206)
St. Lawrence Seaway Cellular Partnership (820289)
Texas RSA #11B Limited Partnership (818450)
Texas RSA 7B2 Limited Partnership (818442)
Tyler/Longview/Marshall MSA Limited Partnership (818402)
Virginia RSA 2 Limited Partnership (818492)
Wisconsin RSA #1 Limited Partnership (806033)
Wisconsin RSA #2 Partnership (806033)
Wisconsin RSA #6 Partnership, LLP (806033)
Wisconsin RSA No.8 Limited Partnership (806033)
WUE, Inc. (820460)
Wyoming 1 – Park Limited Partnership (805260)

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[1] Cellco Partnership d/b/a Verizon Wireless acquired Rural Cellular Corporation in 2008 and Alltel Corporation in 2009. Following those acquisitions, a number of the entities listed herein were collapsed into Cellco or to Alltel Communications, LLC. As a result, some of the Form 499 filer identification numbers listed here may no longer be active.

[2] Cellco files a consolidated 499 for itself and all other Verizon Wireless licensees not specifically listed.

Verizon Wireless Statement of Compliance

Rule § 64.2005 Use of Customer Proprietary Network Information Without Customer Approval

Verizon Wireless is a provider of commercial mobile radio services ("CMRS"). CPNI is used, disclosed or accessed to provide or market Verizon Wireless services to customers pursuant to the "total service approach" authorized by section 64.2005(a), to perform activities authorized under Section 222 of the Act and subsections 64.2005(b)(1), (c) and (d) of the CPNI Rules, and to comply with legal requirements (e.g., lawful process). Verizon Wireless does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers.

Rule § 64.2007 Approval Required for Use of Customer Proprietary Network Information

Verizon Wireless seeks opt-in approval from certain business customers for the purpose of marketing the services and products of itself and its affiliates. Verizon Wireless also seeks opt-in approval from some of its business and consumer customers for the purpose of using and sharing CPNI with affiliates to provide relevant marketing messages from Verizon Wireless and other companies. Pursuant to section 64.2007(a)(2), when Verizon Wireless obtains approval or disapproval from these customers, the approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval. Pursuant to section 64.2007(a)(3), Verizon Wireless maintains a record of its customers' approval for at least one year.

Verizon Wireless also seeks opt-out approval from some of its business and all consumer customers for the purpose of marketing the communications-related services of its affiliates. Pursuant to section 64.2007(a)(2), when Verizon Wireless obtains approval from customers, this approval remains in effect for two years, unless the customer revokes or limits such approval before then. At least every two years, Verizon Wireless provides those customers from whom it obtained approval another CPNI opt-out notice, pursuant to section 64.2008(d)(2). When a customer indicates disapproval, that disapproval remains in effect indefinitely. Pursuant to section 64.2007(a)(3), Verizon Wireless maintains a record of its customers' approval for at least one year.

Rule § 64.2008 Notice Required for Use of Customer Proprietary Network Information

Opt-in Approval. Verizon Wireless provides written opt-in notice to certain business customers in order to use, disclose and permit access to CPNI for the purpose of marketing the services and products of itself and its affiliates and to certain business and consumer customers in order to use and share CPNI for the purpose of providing relevant marketing messages from Verizon and other companies. The contents of the notices provided to these customers comply with the general requirements for notices and the specific requirements for opt-in notices set forth in section 64.2008 and include the

following minimum content, although the specific language used to convey it may vary. The notices state that CPNI is certain information relating to the quantity, technical configuration, type, destination, location, and amount of use of telecommunications services purchased from Verizon Wireless. The notices state that the customer has a right, and Verizon Wireless has a duty, under federal law, to protect the confidentiality of CPNI. The notices inform the customers of their right to deny approval and provide sufficient information to enable the customers to make informed decisions as to whether to grant or deny the approval requested. The notices communicate that the denial or withdrawal of consent will not affect provisioning of services to which the customer subscribes and that the customer may withdraw consent at any time. The notices are typewritten in sufficiently large font, and are provided in a manner so as to be readily apparent to the customer. If any portion of the notices is translated into another language, then all portions of the notices are translated into that language. Verizon Wireless maintains records of notification for at least one year.

Opt-Out Approval. Verizon Wireless provides written opt-out notice to some of its business and all consumer customers to share information among the Verizon family of companies and Vodafone for the purpose of marketing communications-related services. The contents of the notices it provides to these customers comply with the general requirements for notices and the specific requirements for opt-out notices set forth in section 64.2008. The notices state that CPNI is certain information relating to the type, destination, technical configuration, location, and amount of use of telecommunications services purchased and related billing information that is made available to Verizon Wireless solely by virtue of the customer's relationship with Verizon Wireless. The notices state that the customer has a right, and Verizon Wireless has a duty, under federal law, to protect the confidentiality of CPNI. The notices inform the customers of their right to deny approval and provide sufficient information to enable the customers to make informed decisions as to whether to grant or deny the approval requested. The notices state that the denial or withdrawal of consent will not affect provisioning of services to which the customer subscribes. The notices are typewritten in sufficiently large font. The notices advise customers that they can opt out by dialing the toll free number provided in the notice. That number is available 24 hours a day, seven days a week. Customers are also informed that they may opt out through the "My Verizon" on-line platform or by calling Customer Care during its regular hours. The entire notice is translated into Spanish for those customers for whom Verizon Wireless provides a Spanish bill. Verizon Wireless waits a minimum of 33 days after mailing customers notice and providing an opportunity to opt out before assuming customer approval. Verizon Wireless maintains records of notification for at least one year.

Rule § 64.2009 Safeguards Required for Use of Customer Proprietary Network Information

Verizon Wireless has implemented a system designed to establish the status of the customer's CPNI approval prior to the use or disclosure of CPNI. Verizon Wireless maintains documentation on its intranet site, available to all employees, regarding procedures for safeguarding CPNI.

Training: Consistent with the requirements of section 64.2009(b), Verizon Wireless has an extensive training program that informs all employees, including sales, marketing, and customer service personnel, about the CPNI rules and that failure to comply with the CPNI rules can be the grounds for disciplinary action, up to and including termination of employment. Verizon Wireless has a comprehensive "Code of Conduct" that specifically addresses the importance of compliance with CPNI requirements, trains new employees at time of hire on the Code, and offers generalized and specialized training on the Code periodically. The Code defines CPNI and specifically prohibits its disclosure without complying with the company's policies for disclosing such information.

Verizon Wireless' Office of Integrity and Compliance ("OIC") has primary responsibility for drafting, disseminating, and training on the Code. It also maintains a confidential 800 number for employees to report possible violations of the Code, including violations related to customer privacy. Employees are advised of the 800 number via the Code, training, postings in the workplace, periodic e-mails, and an OIC brochure. The OIC brochure specifically instructs employees to report "misuse of confidential or proprietary information" and violations of law or regulations relating to "consumer protection."

Training on maintaining security of CPNI includes the following:

- Initial mandatory Code of Conduct training for all employees.
- Periodic mandatory Code of Conduct training for all employees.
- Initial mandatory Keys for Safeguarding Privacy and Confidential Information training for all employees.
- Periodic mandatory Keys for Safeguarding Privacy and Confidential Information training for all employees.
- E-mail alerts to all employees.
- Postings on the Verizon Wireless internal intranet site, "VZ Web."

Verizon Wireless' Workforce Development Group is responsible for new hire and all developmental training for Verizon Wireless employees. Verizon Wireless requires employees to take specific courses that address the need to protect the privacy of customer information, and instructs employees, through written materials and courses, on procedures for doing so. Verizon Wireless requires that newly hired employees of the company are trained on privacy of records within their first day of employment or first access to a company computer.

To ensure that Verizon Wireless agents who have access to confidential information receive ongoing training, the OIC developed an online program called "Protecting Confidential Customer Information." The goal of this training course is to help agents protect sensitive information about Verizon Wireless and its customers. Verizon Wireless requires all of its indirect agents and customer service outsource vendors to complete this training, unless the entity has a comparable version of the training as a requirement for its employees.

Records of Marketing Campaigns: Pursuant to section 64.2009(c), Verizon Wireless tracks its consumer marketing and sales campaigns that use CPNI, and records of these campaigns are retained for at least one year. A description of each campaign, the CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign resides in Verizon Wireless' secure CPNI databases. In all instances where opt-out consent is sufficient for use of CPNI in marketing or sales campaigns by affiliates, requests for customer information are processed by Verizon Wireless' Enterprise Data Warehouse team, which maintains records of customers' CPNI opt-out status. For these marketing and sales campaigns by affiliates, the Enterprise Data Warehouse team excludes all customers who have opted out of sharing CPNI. As stated previously, Verizon Wireless has sought opt-in CPNI consent from certain business and certain consumer customers. In instances where opt-in consent is required, the Verizon Wireless sales teams are required, prior to the use of CPNI, to ascertain that the customer has provided consent. In addition, the Enterprise Data Warehouse has adopted a Data Share Request/Approval form that must be completed prior to sharing CPNI outside of Verizon Wireless. The Enterprise Data Warehouse maintains records of all such requests.

Supervisory Review Process: Pursuant to section 64.2009(d), Verizon Wireless has established a supervisory review process for all outbound marketing programs before they are implemented to ensure compliance with the CPNI rules, and records of compliance are maintained for at least one year. Verizon Wireless strictly limits the number of employees who have access to customer information that is used to generate outbound marketing campaigns. Call detail records are not available in the process used to generate outbound marketing campaigns. Sales personnel do not have the authority to initiate marketing programs independently from this process.

Certification: Pursuant to section 64.2009(e), this statement of compliance is preceded by a certificate signed by an officer of Verizon Wireless. An explanation of actions taken against data brokers and a summary of customer complaints concerning the unauthorized release of CPNI is attached below.

Notification of Opt Out Failure: Verizon Wireless has in place a process to provide written notice to the Commission within five business days in the event of a failure of any of its opt-out mechanisms that is more than an anomaly. The written notice meets the requirements of section 24.2009(f).

Rule § 64.2010 Safeguards on the Disclosure of Customer Proprietary Network Information

Verizon Wireless has taken reasonable measures designed to discover and protect against attempts to gain unauthorized access to CPNI. Verizon Wireless requires appropriate authentication prior to releasing non-call detail CPNI to a customer. Verizon Wireless does not disclose call detail information over the telephone, based on customer-initiated contact. Verizon Wireless also does not provide online access to any CPNI unless the customer first provides a password that is established in accordance with section

64.2010(e) or pursuant to the business customer exemption (BCE) in accordance with section 64.2010(g). Verizon Wireless representatives disclose CPNI at its retail locations only to customers who present valid government-issued photo IDs that match the customer's account information. Verizon Wireless notifies its customers through either a text message, e-mail, letter to address of record, or voice call to the telephone number of record whenever a password, customer response to a back-up means of authentication, online account, or address of record is created or changed, except when service is initiated. The notification does not reveal the changed information and is not sent to the new account information. These notices are not triggered for customers under the BCE.

Rule § 64.2011 Notification of Customer Proprietary Network Information Security Breaches

In the event a breach reportable under section 64.2011 occurs, Verizon Wireless has established the following notification procedures: No later than seven business days after determination of a CPNI breach, as defined in section 64.2011(e), Verizon Wireless notifies law enforcement through the reporting facility maintained at https://www.cpnireporting.gov/cpni/content/disclaimer.seam. Verizon Wireless does not notify its customers of or publicly disclose the breach until at least seven full business days have passed after notification of law enforcement, unless Verizon Wireless believes there is an extraordinarily urgent need to notify any class of affected customers before that time. In that case, Verizon Wireless notifies and consults with the relevant investigating agency prior to notifying affected customers, in accordance with section 64.2011(b)(2). If the relevant investigating agency directs Verizon Wireless not to disclose the breach beyond the seven-business day period, in accordance with section 64.2011(b)(3), Verizon Wireless will not disclose the breach until the agency provides notice that disclosure will no longer impede or compromise a criminal investigation or national security. In 2013, there were no breaches about which Verizon Wireless believed there was an extraordinarily urgent need to notify affected customers.

After completing the process of notifying law enforcement in accordance with section 64.2011(b), Verizon Wireless notifies its customers of the breach of those customers' CPNI. Verizon Wireless maintains records of breaches, notification to law enforcement, and customer notification for at least two years. Those records include, when available, dates of discovery and notification, descriptions of the CPNI that was breached, and the circumstances of the breach.

Explanation of Actions Taken Against Data Brokers

Actions Against Data Brokers: In 2013, Verizon Wireless commenced no new actions, as defined by the Commission, against data brokers.

Information about Processes Used by Pretexters to Access CPNI and Steps Verizon Wireless Is Taking to Protect CPNI: In 2013, Verizon Wireless continued to investigate the use of pretexting, along with other methods including ongoing attempts to access customer online accounts, in a fraudulent scheme to steal devices from Verizon Wireless. The results of these investigations were provided to law enforcement for further investigation. Verizon Wireless also published communications to employees and agents during 2013 containing guidance about protecting customer privacy and safeguarding sensitive data, including alerts against certain pretexting techniques Verizon Wireless had recently observed.

Summary of Customer Complaints

Summary of Customer Complaints in 2013 Concerning Unauthorized Release of CPNI:

In 2013, Verizon Wireless received 29 substantiated complaints from its customers regarding unauthorized release of their CPNI. These complaints fell into the following categories (many complaints fell within two categories):

Complaints involving improper access by employees: 23
Complaints involving improper disclosure to unauthorized individuals: 24
Complaints involving improper online access by unauthorized individuals: 2