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March 3, 2014

VIA ECFS

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

Re: Annual Customer Proprietary Network Information Compliance Certification; EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Telecom Italia Sparkle of North America, Inc. ("TISNA") and pursuant to 47 C.F.R. § 64.2009(e), attached please find TISNA's 2014 Annual Customer Proprietary Network Information compliance certification covering calendar year 2013.

Please contact the undersigned at (202) 342-8614 if you have any questions regarding this filing.

Respectfully Submitted,

Denise N. Smith

Counsel to Telecom Italia Sparkle of North America, Inc.

Annual Customer Proprietary Network Information Certification
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

March 2014

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Name of Company: Telecom Italia Sparkle of North America, Inc.

Form 499 Filer ID: 820676

Name of Signatory: Mark S. Gasbarra

Title of Signatory: President and Director of Sales

I, Mark S. Gasbarra, certify that I am an officer of Telecom Italia Sparkle of North America, Inc. ("Telecom Italia"), and acting as an agent of Telecom Italia, that I have personal knowledge that Telecom Italia 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 Telecom Italia's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

Telecom Italia has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Telecom Italia has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.,* through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's CPNI rules.

Telecom Italia has not received any customer complaints during the above-referenced certification period concerning the unauthorized release of CPNI .

Mark S. Gasbarra
President and Director of Sales
Telecom Italia Sparkle of North America, Inc.

Date: 2/26/14

Customer Proprietary Network Information Certification
Attachment A

Telecom Italia has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures.

Safeguarding against pretexting

- Telecom Italia takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Telecom Italia is committed to notifying the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Telecom Italia trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Telecom Italia's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

- Telecom Italia employees are required to review Telecom Italia's CPNI practices and procedures and to acknowledge their comprehension thereof.

- Telecom Italia has an express disciplinary process in place for violation of the company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

Telecom Italia's use of CPNI

- Telecom Italia may use CPNI for the following purposes:

  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
  - To market services formerly known as adjunct-to-basic services; and

- To market additional services to customers *with the receipt of informed consent via the use of opt-in or out-out, as applicable.*

- Telecom Italia does not disclose or permit access to CPNI to track customers that call competing service providers.

- Telecom Italia discloses and permits access to CPNI where required by law (*e.g.,* under a lawfully issued subpoena).

Customer approval and informed consent

- Telecom Italia does not use, disclose, share or otherwise provide CPNI for any purposes for which customer approval is required. For example, Telecom Italia does not use, disclose, share or otherwise provide CPNI for marketing purposes. If this policy changes in the future, Telecom Italia will ensure that its customer notification regarding CPNI comply with all applicable Commission regulations.

- Telecom Italia uses dedicated account representatives to facilitate customer service requests from its business customers according to contracts that specifically address customer's privacy.

Additional safeguards

- Telecom Italia designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).

- Telecom Italia does not provide CPNI through telephone or online access, nor does Telecom Italia have any retail locations.

- Telecom Italia may negotiate alternative authentication procedures for services that Telecom Italia provides to business customers that have both a dedicated account representative and a contract that specifically addresses Telecom Italia's protection of CPNI.

- In the event of a breach of CPNI, Telecom Italia will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Telecom Italia to delay notification, or Telecom Italia and the investigatory party agree to an earlier notification. Telecom Italia will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.