

# Best Practices to Ensure Protection of CPNI

---

*Telecommunications Carriers' Use of Customer Proprietary  
Network Information and Other Customer Information;  
Petition for Rulemaking to Enhance Security and  
Authentication Standards for Access to Customer Proprietary  
Network Information*

CC Docket No. 96-115, RM-11277

# CPNI must be protected from unlawful disclosure

---

- Pretexters pose as someone else via unlawful means
- Primary concern is access to call detail records
- Carriers have every incentive to protect customer records - lax carrier security is not the problem

# Mid-Size Carriers verify customer identity

---

- Mid-size carriers are committed to protecting customer privacy
- Customer identity is always verified; identity verification methods differ but include personal information known only to subscriber, information from customer bill, customer code, passcode
- Business and residential customers are handled differently; privacy concerns and customer needs are different

# Consumers do not want mandatory pass-codes

---

- Most consumers do not want pass-codes (it is estimated that only approximately 10% of customers opt to have them)
- Customers forget pass-codes. Many customers only call occasionally and will not remember pass-codes
- Large business customers with multiple internal contacts create additional problems with mandatory pass-codes

# Pass-codes should be optional, not mandatory

---

- Establishing pass-codes for all those who don't have them creates a significant vulnerability - could result in pretexters calling and establishing pass-codes.
- Pretexters can call and say they have forgotten their pass-codes/ reset them.
- Pass-codes have not yet been proven effective and are likely more vulnerable than authentication procedures which could include information from account, personal info, etc. Other authentication methods can be as effective and more customer-friendly. Pretexters will find a way around pass-codes.
- Mandatory pass-codes will increase costs- they will impose substantial operational costs for OSS modifications and associated operator training; and will increase service rep time when customers lose pass-codes. Cost increases harm all consumers.

# Carriers should implement market-appropriate measures

---

- Allow carriers the option of adopting a policy of not discussing the telephone number information in call detail records via phone; must be released to billing or e-mail address on record. In emergency situations, LEC rep could call the customer with the information at the home phone or at a contact # from the account.
- This option offers superior protection to pass-codes, so it should be available even if the Commission allows companies the option to adopt mandatory pass-codes to protect telephone numbers in call detail records.

# Multiple means of verification

---

- We support the recommendations of the Anti-pretexting working group for “sensitive requests” /customer identity verification
- Allow multiple methods of identity verification, based on customer choice; pass-codes as a mandatory option; encouraged by service reps

# Support sensible measures that protect customers

---

- Require pass-codes for on-line access to CPNI
- Carriers include written procedures for CPNI as part of annual certification
- Carriers should have the flexibility to use alternative approaches for business customers
- Do not require customers to reset existing pass-codes.
- Allow last four digits of SSN to serve as pass-code if additional information is used to verify identity.

# The Commission must assure protection of consumer information

---

- All consumers deserve protection
- Commission should assure regulatory parity
- VoIP consumer deserve no lower level of protection
- Commission spoke to interest of VoIP consumers in 911 proceeding