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SPECIAL BULLETIN

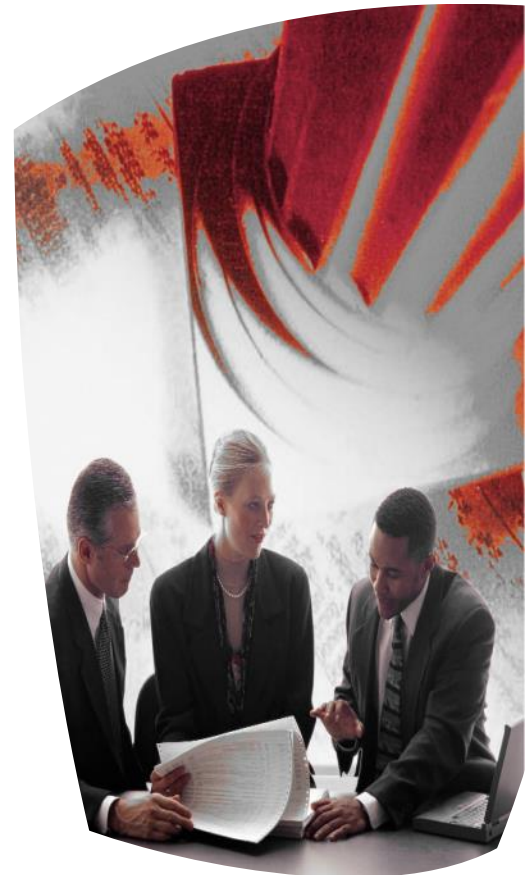
Reinstated CPNI Rules *Reminder*

As most recently mentioned in the 6-30-17 *Alexicon Insider*, as a result of congress' elimination of the Broadband Privacy rules adopted last October, the FCC took action to reinstate the rules that were in effect prior to the Broadband Privacy decision. To do this, the Commission released what was termed a "ministerial" [order](#) to reinstate the old rules. This rule change was to be effective immediately upon publication in the Federal Register.

The reinstated rules were published in the Federal Register on September 21, meaning the pre-2016 Broadband Privacy Order rules are back in effect. Importantly, these rules include:

- The recordkeeping and annual certification requirements in 47 CFR § 64.2009 (c) and (e). **As a result, an annual CPNI compliance certification will once again be required on March 1, 2018.**
- Customer approval requirements (64.2007)
- Notice Obligations (64.2008)
- Security safeguards (64.2009 and 64.2010)
- Breach notification requirements (64.2011)

Please let us know if you have any questions.



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Questions? Comments?

Contact Chris Barron

chris@alexicon.net