

Annual CPNI Certifications Due March 1, 2016

February 9, 2016



It's time again for carriers to submit the annual Customer Proprietary Network Information (CPNI) certification to the FCC. Telecommunications carriers and interconnected VoIP providers are required to certify annually their compliance with the FCC's CPNI protection rules. The 2016 report covers calendar year 2015 and will be due by March 1, 2016. (Entities providing telecommunications on a private carriage basis and non-interconnected VoIP providers are not required to file the CPNI certification).

Our [recent client advisory](#) provides an overview of the filing requirements. Please note that the certification requires a "brief statement" describing how the filer's policies ensure compliance with the CPNI rules and requires certain information regarding complaints received within the prior year. Certifications must be signed by an officer with personal knowledge of the company's CPNI compliance. Providers may file CPNI certifications via an FCC web application or via ECFS, mail or hand delivery.

The FCC has consistently enforced compliance with the CPNI certification reporting requirement. As we've noted in [prior posts](#), penalties for failing to file the CPNI certification have varied widely over time, but seem to have settled at [\\$25,000 per failure to file](#). To avoid such exposure, filers should be sure to file the certification by the March 1 deadline. In addition, this filing provides an opportunity for filers to take time to review their CPNI policies and actual business practices to ensure they still meet the FCC's CPNI protection requirements.