
UPDATE
February 22, 2023

FCC Issues Enforcement Advisory: CPNI Officer's Certificate Due March 1, 2023

Telecommunications carriers and interconnected VoIP providers must file their annual certification demonstrating compliance with the Customer Proprietary Network Information ("CPNI") rules by **March 1, 2023**. As with prior years, the FCC recently released an [Enforcement Advisory](#) that includes answers to frequently asked questions, a CPNI certification template and the text of the CPNI rules.

Section 222 of the Communications Act requires telecommunications carriers, and, since 2007, interconnected VoIP providers, to protect the confidentiality of "customer proprietary network information," commonly known as "CPNI." Under the FCC's CPNI rules, an officer of each telecommunications carrier and interconnected VoIP provider must file an annual certificate with the FCC stating that the officer has personal knowledge that the provider has established operating procedures adequate to ensure compliance with the FCC's CPNI rules. The carrier must also provide a statement explaining how its operating procedures ensure that it is in compliance with the FCC's CPNI rules.

Filings can be made in EB Docket No. 06-36 via the FCC's [ECFS](#) system. The Enforcement Advisory includes an acceptable sample form. Use of the sample form is not mandatory provided all required information is included.

The Enforcement Advisory further reminded companies that failure to comply with the CPNI rules, including the annual certification requirement, may subject them to enforcement action, including monetary forfeitures of up to \$237,268 for each violation or each day of a continuing violation, up to a maximum of \$2,372,677.

If you have any questions regarding CPNI or the filing of the officer's certificate, please contact Bruce Beard at (314) 394-1535 or bbeard@cinnamonmueller.com.

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