

**TESTIMONY OF WILLIAM D. DURAND
EXECUTIVE VICE PRESIDENT & CHIEF LEGAL COUNSEL
NEW ENGLAND CABLE & TELECOMMUNICATIONS ASSOCIATION, INC.**

The General Law Committee

March 6, 2012

Senate Bill 315: AA Prohibiting the Unnecessary Collection of Social Security Numbers

My name is Bill Durand and I am the Executive Vice President and Chief Legal Counsel for the New England Cable & Telecommunications Association, Inc. (NECTA). NECTA represents substantially all cable television operating and programming companies that serve Connecticut and the other five states in the region.

The cable industry takes the issue of privacy and protecting our customers' social security information extremely seriously. For that reason, we share the sponsor's intent in safeguarding sensitive consumer information.

Cable providers use the unique identifying information of social security numbers as one of the available methods to assist in protecting customers from threats such as identity theft and fraud, managing customer relationships, and delivering services in a cost-effective manner.

In short, with appropriate protections, social security numbers remain a highly effective resource to protect customers and provide service with the speed and reliability our customers have come to expect in Connecticut.

When customer social security information is provided to Connecticut cable companies, providers are already subject to stringent federal rules to safeguard it (47 USC 551).

Pursuant to requirements of federal law this type of information is currently categorized as "personally identifiable information" or "PII".

As a result of these federal mandates, all Connecticut cable providers have procedures in place to ensure that this unique customer information is protected and not improperly disclosed or misused.

No cable company in Connecticut requires that either potential or existing customers provide social security numbers as a condition for receiving service.

In sum, because we have a proven track record of protecting our customers' personally identifiable information, are already subject to stringent federal rules governing the use and protection of it, and have legitimate reasons for utilizing it, we would respectfully request that cable companies be exempt from the proposed new state prohibition as proposed in SB 315.

Thank you.