

# Morgan Lewis

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October 17, 2016

**Via E-Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: EB Docket No. 06-36  
Annual CPNI Certification for Masergy Communications, Inc. - Clarification**

Dear Ms. Dortch:

Masergy Cloud Communications, Inc. ("Masergy Cloud"), by undersigned counsel, hereby files a clarification to its Annual CPNI Certification originally filed in Docket No. 06-36. Masergy Cloud's Annual CPNI Certification inadvertently omitted that the Certification also applies to Masergy Communications, Inc. ("Masergy"). Masergy Cloud and Masergy are managed by the same individuals, and Masergy complies with the same CPNI requirements instituted at Masergy Cloud. In an abundance of caution, Masergy Cloud hereby seeks to clarify the FCC's records and therefore clarifies that its 2016 Annual CPNI Certification should be read to include a certification of compliance for both Masergy Cloud and Masergy.

Should you have any questions, please do not hesitate to contact us.

Respectfully submitted,

*/s/ Douglas D. Orvis II*

Douglas D. Orvis II

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**AFFIDAVIT**

I, Irene Peterson, being first duly sworn according to law does hereby state as follows:

1. My name is Irene Peterson. I am the Vice President of Tax and Regulatory of Masergy Communications, Inc. (“Masergy”) and Assistant Secretary of Masergy Cloud Communications, Inc. (“Masergy Cloud”). My business address is 2740 North Dallas Parkway, Suite 260, Plano, TX 75093.

2. I have personal knowledge of the CPNI compliance undertaken by Masergy. As indicated in the April 22, 2016 CPNI certification of Masergy Cloud, Masergy Cloud has established sufficient operating procedures that are adequate to ensure compliance with the Commission’s CPNI regulations. Masergy is commonly operated and uses the same CPNI compliance measures instituted at Masergy Cloud, and CPNI compliance is managed by the same individuals. Accordingly, the April 22, 2016 certification of CPNI compliance should be read to include both Masergy and Masergy Cloud. The omission of a specific reference to Masergy in the 2016 and previous CPNI certificates was an oversight caused by a scrivener’s error.

3. To the best of my knowledge, the response provided today is, in all material respects, truthful and accurate and provides all information or documents that are responsive to the Commission’s request.

I state under penalty of perjury that the foregoing is true and correct.

Executed on October 17, 2016



Irene Peterson  
Vice President of Tax and Regulatory of Masergy Communications, Inc.  
Assistant Secretary of Masergy Cloud Communications, Inc.