

Annual Customer Proprietary Network Information Certification for 2018
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2019 Covering Calendar Year 2018

1. **Date filed:** February 8, 2019
2. **Name of company(s) covered by this certification:** Zayo Group, LLC
3. **Form 499 Filer ID:** 828965
4. **Name of signatory:** Mike Mooney
5. **Title of signatory:** SVP, General Counsel and Corporate Secretary
6. **Certification:**

I, Mike Mooney, certify that I am an officer of the company named above, and acting as an agent of the companies, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that they are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken action (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Mike Mooney
SVP, General Counsel and Corporate Secretary
Date: February 8, 2019

Attachments: Attachment A – Annual CPNI Certification Statement

Attachment A – Annual CPNI Certification Statement

Zayo Group, LLC (“Company”) has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended (“section 222”) and the rules of the Federal Communications Commission (“FCC”) pertaining to customer proprietary network information (“CPNI”) set forth in sections 64.2001 – 64.2011 of the Commission’s rules. This attachment summarizes those practices and procedures, which are periodically updated so that they are adequate to ensure compliance with the Commissions’ updated CPNI rules.

The Company maintains a Customer Proprietary Network Information Protection Policy governing the Company’s use of, protection of, and disclosure of CPNI. The Company provides private telecommunications services over its fiber network to its customers pursuant to ICB contracts. The Company’s customer contracts contain confidentiality clauses that address and protect customers’ confidential information. It is the Company’s policy not to disclose or use CPNI except in accordance with its CPNI Policy, its agreements and as required by applicable law.

Safeguarding against pretexting

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based upon customer-initiated contacts. The Company is committed to notifying the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers. The Company did not take any actions against data brokers in the past year.

Training and discipline

The Company has an express disciplinary process in place for violation of the Company’s CPNI Policy. In addition to the Company’s CPNI Policy, the Company’s employees are required to review and abide by Company’s Code of Conduct, which prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

The Company’s use of CPNI

The Company uses CPNI for the following purposes:

- (1) To initiate, render, maintain, repair, bill and collect for services;
- (2) To protect the Company’s property rights; or to protect subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
- (3) For network maintenance; and
- (4) As required by applicable law.

Other than as legally permitted, the Company does not use CPNI for marketing purposes, nor does the Company share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third party for the purpose of marketing any service.

Other than as legally permitted, the Company’s policy is not to share, sell, lease or otherwise provide CPNI to third parties. The Company will disclose CPNI to a third party only when required by a lawfully issued government subpoena or pursuant to an appropriate non-disclosure agreement for corporate or financial transactions.

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The Company has not received any consumer complaints concerning unauthorized release of CPNI in the past year.

Additional safeguards

The Company does not use CPNI for marketing campaigns, and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.

The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules. Except when making a one-time oral request in connection with a telephone contact with the customer, the Company's employees, contractors, agents, affiliates and partners, including sales and marketing agents, are required to obtain supervisory review before making any request to use, disclose or permit access to CPNI. All requests for such review are directed to the Company's CPNI Compliance Officer (which is its General Counsel) unless a unit supervisor has received prior authority to conduct such reviews in accordance with the foregoing.

The Company does not disclose CPNI over the phone and does not allow for online access to CPNI. In the event of a breach of CPNI, the Company will comply with all applicable breach notification laws.

The Company designates one or more officers, as agent or agents of the Company, to sign and file a CPNI compliance certificate on an annual basis. The preceding certificate conforms to the requirements set forth in FCC rule 64.2009(e) and is signed by an officer of the Company who has personal knowledge of the Company's operating procedures that are adequate to ensure compliance with the rules in Section 64.2001 *et seq.*