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February 11, 2019
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

**RE: Uniti Fiber, LLC CPNI Certification
 EB Docket No. 06-36; CY2017**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Uniti Fiber, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant

tms: FCCx1903 Uniti Fiber

Enclosures
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification: Covering calendar year 2018

Name of company(s) covered by this certification: Uniti Fiber, LLC f/k/a
PEG Bandwidth, LLC; PEG Bandwidth DE, LLC;
PEG Bandwidth DC, LLC; PEG Bandwidth IL,
LLC; PEG Bandwidth IA, LLC; PEG Bandwidth
LA, LLC; PEG Bandwidth MA, LLC; PEG
Bandwidth MD, LLC; PEG Bandwidth MS, LLC;
PEG Bandwidth NJ, LLC; PEG Bandwidth NY,
LLC; PEG Bandwidth PA, LLC; PEG Bandwidth
TX, LLC; PEG Bandwidth VA, LLC

Form 499 Filer ID: 828744

Name of signatory: Jeffrey R. Strenkowski

Title of signatory: Vice President, Deputy General Counsel of
Governmental Affairs

1. I, Jeffrey R. Strenkowski, certify that I am Vice President, Deputy General Counsel of Governmental Affairs of the company named above, and acting as an agent of the company, 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 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*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.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §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.

/s/Jeffrey R. Strenkowski

Jeffrey R. Strenkowski, Vice President, Deputy General
Counsel of Governmental Affairs

February 11, 2019

Date

Attachments: Accompanying Statement explaining CPNI procedures

UNITI FIBER LLC

STATEMENT OF CPNI USAGE POLICY AND PROCEDURES

Uniti Fiber LLC f/k/a/ PEG Bandwidth, LLC; PEG Bandwidth DE, LLC; PEG Bandwidth DC, LLC; PEG Bandwidth IL, LLC; PEG Bandwidth IA, LLC; PEG Bandwidth LA, LLC; PEG Bandwidth MA, LLC; PEG Bandwidth MD, LLC; PEG Bandwidth MS, LLC; PEG Bandwidth NJ, LLC; PEG Bandwidth NY, LLC; PEG Bandwidth PA, LLC; PEG Bandwidth TX, LLC; PEG Bandwidth VA, LLC (hereinafter collectively, "Uniti Fiber" or "Company") is a facilities-based "carrier's carrier" that specializes in providing high-capacity point-to-point special access replacement services to cellular telephone companies. The services that Uniti Fiber provides are used to establish connectivity between a cellular telephone provider's point-of-presence and its cell sites in a given market. Uniti Fiber's primary customer base consists of large and very sophisticated wholesale customers. The Company provides its services on a retail basis to a very limited number of end-user customers. The Company does not provide its services on a retail basis to the public.

Uniti Fiber does not use CPNI for marketing purposes. Nor does it disclose or permit access to CPNI to third parties for marketing purposes. Uniti Fiber does not collect call data records or similar usage information for the traffic that transits its facilities. In fact, because Uniti Fiber is a carrier's carrier, it does not have access to information about individual end users in a way that would permit it to use CPNI for marketing purposes. Consequently, the requirements contained in the FCC's CPNI rules relating to the process for obtaining customer consent for the use of CPNI for marketing purposes are not applicable to Uniti Fiber. In the event Uniti Fiber should change its capabilities and policies regarding CPNI in the future, it will ensure that the appropriate procedures are in place for obtaining customer consent and for maintaining the required recordkeeping and supervisory review.

Uniti Fiber has not experienced any known breaches of CPNI to date. However, Uniti Fiber is aware of its obligation to report any breaches to law enforcement agencies via the breach reporting facility located at <https://www.cpnireporting.gov/>. Uniti Fiber further understands that it may not notify the affected customer for seven days after reporting the breach. Uniti Fiber will retain for two years records relating to any discovered breaches.

Uniti Fiber takes its obligations to safeguard CPNI seriously. Uniti Fiber has trained its employees with access to CPNI on the limited purposes for which they are authorized to use CPNI, and on the critical importance of protecting CPNI from misuse or unauthorized disclosure. It is Uniti Fiber's policy that any employee who fails to follow Uniti Fiber's policies and procedures with regard to CPNI will be subject to disciplinary action.