



February 12, 2019

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

RE: EB Docket No. 06-36, Annual CPNI Certification

Dear Ms. Dortch:

Attached is the Annual CPNI Certification covering calendar year 2018, pursuant to 47 C.F.R. § 64.2009(e), for Accipiter Communications, Inc. Form 499 Filer ID#814657.

Should you have any questions regarding this certification, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Ruf", is written over the typed name.

Lisa Ruf
Regulatory Assistant

Attachment

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 02/12/2019
2. Name of company(s) covered by this certification: Accipiter Communications, Inc. d/b/a Zona Communications
3. Form 499 Filer ID: 814657
4. Name of signatory: Michael B. Urdahl
5. Title of signatory: President
6. Certification:

I, Michael B. Urdahl, certify that I am an officer 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 CFR § 64.2001 et seq.*

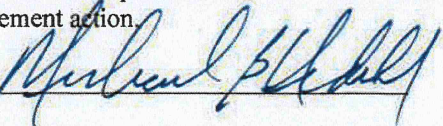
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section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

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.

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.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

ACCOMPANYING STATEMENT EXPLAINING CPNI PROCEDURES

To the best of my knowledge, Accipiter Communications, Inc., d/b/a Zona Communications ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2009.

Accipiter Communications, Inc., d/b/a Zona Communications has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

Company CPNI Status: To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.