

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI for 2018 covering the prior calendar year (2017)

Date filed: February 15, 2018

Name of Company covered by this certification: City of Glenwood Springs, Community Broadband Network

For 499 Filer ID: 827610

Name of signatory: Eric Arnette

Title of signatory: Information Systems Director

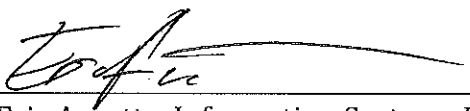
I, Eric Arnette, certify that I am the Information Systems Director of the City of Glenwood Springs, a Colorado home rule municipality, and acting on behalf of the City, that I have personal knowledge that the City has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the City's procedures ensure that the City is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.201 *et seq.* of the Commission's rules.

The City has not taken any actions (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 City has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The City represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The City 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:   
Eric Arnette, Information Systems Director  
City of Glenwood Springs  
101 West 8<sup>th</sup> Street  
Glenwood Springs, CO 81601  
(970) 384-6400

**STATEMENT OF THE CITY OF GLENWOOD SPRINGS, COMMUNITY BROADBAND  
NETWORK REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS GOVERNING  
THE USE AND PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION  
("CPNI")**

The City of Glenwood Springs, Community Broadband Network ("City") has implemented a number of processes and procedures to protect sensitive customer information and to help ensure that CPNI is used and maintained consistent with the rules of the Federal Communications Commission ("Commission").

All City employees working for The Community Broadband Network are required as a general matter to maintain the confidentiality of all customer-related information they obtain in connection with their employment. Moreover, the City implemented a CPNI protection policy to reflect the Commission's CPNI rules. The policy was delivered to all City employees that come in contact with customer-related information, and explains what constitutes CPNI, what requirements apply to use and/or disclosure of CPNI, what type of authentication is required to validate inbound requests for CPNI, and what kind of record keeping and reporting obligations apply to CPNI. The City's policy expressly provides that employees who fail to abide by the policy are subject to disciplinary action.

Consistent with the Commission's rules, the City uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protect the City's rights and property from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

At this time, the City does not use, disclose, or permit access to CPNI to make customers aware of any service offerings other than those within the same category of services to which the customer already subscribes. Further, the City does not at this time share, sell, lease, or otherwise provide any CPNI with or to any unaffiliated third parties for marketing purposes, and it will not do so in the future absent affirmative consent from the affected customers.

The City has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain City employees are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (e.g., take an order or resolve a billing question), and those employees that are authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI.

Through its policy, the City has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of CPNI and the time frames for such required by the Commission's rules.