7200 NW 86th Street, Suite M
Kansas City, Missouri 64153
Phone: 816-368-9081
Fax: 816-903-9401
E-mail: dan.rippee@upnfiber.com

February 15, 2017

**Filed via Electronic Comment Filing System (ECFS)**

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, D.C. 20554

RE: Docket No. 06-36
2017 CPNI Certification for Unite Private Networks-Illinois, LLC

Dear Ms. Dortch:

Attached is the 2017 CPNI Certification submitted by Unite Private Networks-Illinois LLC, consisting of four pages.

Should you have any questions, please don't hesitate to contact me at the above address.

Sincerely,

Dan Rippee

Dan Rippee

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017 covering the prior calendar year 2016

1. Date Filed: February 15, 2017
2. Name of company covered by this certification: Unite Private Networks-Illinois, LLC
3. Form 499 Filer ID: 825841 CORESID: 0014817035
4. Name of Signatory: Kevin Anderson
5. Title of Signatory: Chief Executive Officer
6. Certification:

I, Kevin Anderson, certify that I am Chief Executive Officer of Unite Private Networks-Illinois, LLC ("UPN-Illinois"), and acting as an agent of UPN-Illinois, that I have personal knowledge that UPN-Illinois 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*.

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

UPN-Illinois has not taken any action against data brokers in the past year (i.e., proceedings instituted or petitions filed by a company at either state public utility commissions, the Federal Communications Commission or in court). UPN-Illinois understands that it is required to report any information that it becomes aware of with respect to the improper attempts to utilize CPNI, and has detailed the preventive measures it has taken in Exhibit B (attached).

UPN-Illinois has not received any 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 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.

Kevin Anderson
Chief Executive Officer
Unite Private Networks-Illinois, LLC

**Exhibit A**
**Statement in Support of Certification**

1. During 2016, Unite Private Networks-Illinois, LLC ("UPN-Illinois") did not use or disclose CPNI for any sales or marketing related purposes or activities.

2. UPN-Illinois does not use CPNI for any purpose for which customer approval is required.

3. UPN-Illinois has nonetheless established a supervisory review process regarding approval of CPNI use for sales and marketing purposes, should such use be contemplated, which includes the establishment, prior to such use of, *inter alia,* a CPNI customer approval and notification process.

4. Exhibit B is UPN-Illinois' Directive Regarding Use of Customer Proprietary Network Information ("the Directive") to all employees with access to CPNI. The Directive clearly states that it is UPN-Illinois' policy not to use CPNI for sales or marketing-related activities. The Directive addresses the Commission's requirements regarding customer approval for marketing uses of CPNI and prohibits any marketing-related use or disclosures of CPNI. The Directive also puts employees on notice of disciplinary action for inappropriate uses of CPNI, which may include termination of employment.

5. UPN-Illinois has not used CPNI for any sales or marketing campaigns in 2016.

6. UPN-Illinois has not disclosed or permitted access to CPNI to third parties for sales or marketing-related purposes.

7. UPN-Illinois does not provide customers with telephone or online access to CPNI at this time, but has established a procedure for implementing authentication procedures should such access be contemplated.

8. UPN-Illinois has not taken any actions against data brokers in the past year.

9. UPN-Illinois did not receive any customer complaints in 2016 concerning the unauthorized use, release or disclosure of CPNI.

10. Unless otherwise noted, all statements herein cover operations during 2016.

**EXHIBIT B**

**DIRECTIVE REGARDING**
**USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION**

The Federal Communications Commission ("FCC") regulates the use of customer proprietary network information ("CPNI") by telecommunications carriers and interconnected VoIP providers. CPNI is broadly defined as information collected about a customer telephone call, including, but not limited to, call duration, date, destination, and network details – information that is commonly included in call detail records ("CDRs") and telephone bills for voice calls.

Unite Private Networks-Illinois, LLC (the "Company") is committed to the protection of CPNI and all confidential customer information. It is the Company's policy that CPNI shall be protected from unauthorized use and disclosure. The Company's policy is that CPNI is not used and shall not be disclosed in connection with any sales or marketing-related activities.

Nevertheless, the Company has established a supervisory review process regarding carrier compliance with the Commission's CPNI rules for outbound marketing situations and understands it must maintain records of compliance for a minimum period of one year. In the event that an employee with access to CPNI contemplates any CPNI use in a sales or marketing activity, the employee must first obtain prior express written approval from the Company's CPNI Supervisory Review Officer prior to making such use of the CPNI. Employees may make use of such CPNI only in accordance with an approved plan for CPNI use and customer approval ("Approved Plan"), and may make no marketing use of CPNI until such Approved Plan has been implemented. The CPNI Supervisory Review Officer shall supervise the use of CPNI and ensure that such use complies with the Approved Plan and FCC regulations.

The Company understands that pursuant to 47 C.F.R. 64.2009, it must maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns, if and when any such campaigns are implemented, when those campaigns utilize CPNI. Such records will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company understands the requirement that it retain such records for a minimum of one year.

FCC rules permit customer access to CPNI via online systems or via telephone access if certain customer authentication procedures and systems are put in place. At this time, the Company does not offer its customers online access or access via telephone to CPNI. If online or telephone access to CPNI is requested by a Company customer, such access may not be provided until express written approval of the CPNI Supervisory Officer has been obtained, and the requesting party has provided adequate authentication and verification of its identity.

In accordance with FCC regulations, CPNI may only be used by a telecommunications carrier or VoIP provider for marketing-related purposes with prior customer approval. While the FCC's regulations provide for a number of different ways to obtain customer approval, the type of approval required (for example an opt-in versus and opt-out approach) depends on the particular

marketing use of the CPNI. It shall be the responsibility of the CPNI Supervisory Review Officer to determine whether opt-in or opt-out approval is required.

Under FCC rules, Interconnected VoIP providers may use CPNI to market those services formerly known as adjunct-to-basic services without customer approval. (These include speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features). It is nonetheless the Company's policy that CPNI will not be used to market these services without the approval of the CPNI Supervisory Review Officer and in accordance with an Approved Plan.

Notwithstanding the foregoing, the Company understands that CPNI may be used without prior customer approval under the following circumstances: the provision of inside wiring installation, maintenance, repair services, or to protect the Company, users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to telecommunications services.

Failure to comply with this directive will result in disciplinary action, which may include actions up to and including termination of employment.

Kevin Anderson
Chief Executive Officer

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