



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
[www.inteserra.com](http://www.inteserra.com)

February 19, 2018  
**Via ETFS Filing**

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

**RE:     Conterra Ultra Broadband, LLC                    499 Filer ID 823694**  
          **Conterra Wireless Broadband, LLC                499 Filer ID 826946**  
          **CY2017 Annual CPNI Certification**  
          **EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 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 Conterra Ultra Broadband, LLC and its affiliate Conterra Wireless Broadband, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@inteserra.com](mailto:cwrightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman  
Consultant

cc:     Tanya Gardner - Conterra Ultra Broadband, LLC  
tms:    FCCx1801

CW/kf

**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 for 2018:	Covering calendar year 2017
Name of companies covered by this certification:	Conterra Ultra Broadband, LLC Conterra Wireless Broadband, LLC
Form 499 Filer ID:	
Conterra Ultra Broadband, LLC	823694
Conterra Wireless Broadband, LLC	826946
Name of signatory:	Shane Turley
Title of signatory:	SVP & General Counsel

1. I, Shane Turley, certify that I am an officer of the companies 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.

DocuSigned by:



B1C533481F0545E

Shane Turley, SVP & General Counsel  
Conterra Ultra Broadband, LLC  
Conterra Wireless Broadband, LLC

Date: 2/16/2018

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (not applicable, see Statement)  
Summary of customer complaints (not applicable, See Statement)

**Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC Statement Regarding Customer Proprietary Network Information (CPNI) Operating Procedures**

Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (collectively “Conterra”), in accordance with section 64.2009(e), submit this statement summarizing how Conterra’s operating procedures are designed to ensure compliance with the Commission’s CPNI rules. Each company provides exclusively broadband (backhaul) services to schools and libraries and other carriers. This statement summarizes the procedures that each company has implemented to safeguard the CPNI of its respective customers.

Conterra values its customers’ privacy, and takes measures to ensure that it protects CPNI. It is Conterra’s policy to protect the confidentiality of its customers’ information. Conterra does not use, disclose, or permit access to its customers’ CPNI except as such use, disclosure, or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commission’s implementing rules.

As necessary, Conterra may use CPNI for the permissible purposes enumerated in the Act and the Commission’s rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. The company also may use CPNI to protect its rights or property.

Conterra has a process in place for verifying its customers’ identity during an in-bound call. Conterra does not release call detail information during an in-bound call.

Conterra trains its personnel in the use of CPNI. Conterra has an express disciplinary process in place for violation of the company’s CPNI policies.

Conterra does not use CPNI to market products and services to customers outside of the category of service to which the customer already subscribes. Conterra also does not share CPNI with its affiliates or third parties for marketing purposes. If, in the future, Conterra seeks to use CPNI for these purposes, then it will provide the appropriate notice to customers and will maintain a list of customer preferences. Conterra also will maintain a record of any marketing campaign in accordance with the Commission’s rules.

Conterra takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Conterra has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach that result in the unauthorized access to, use, or disclosure of CPNI. Conterra will maintain a record of the notification in accordance with the Commission’s rules.

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publically available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are described throughout this document.

Conterra has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.