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February 19, 2019
Via ECFS Filing

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

RE: InterCarrier Networks, LLC
EB Docket No. 06-36; CPNI Certification CY 2018

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 InterCarrier Networks, 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. Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant

tms: FCx1901

Enclosures
CW/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 for 2018: Covering calendar year 2018

Name of company(s) covered by this certification: InterCarrier Networks, LLC

Form 499 Filer ID: 828435

Name of signatory: Erik Roggenburg

Title of signatory: Vice President, Finance

1. I, Erik Roggenburg, 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 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.

Erik Roggenburg
Erik Roggenburg
Vice President, Finance

Date: February 14, 2019

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)

InterCarrier Networks, LLC
Statement of Customer Proprietary Network Information (CPNI)
Operating Procedures and Compliance

InterCarrier Networks, LLC ("InterCarrier"), in accordance with section 64.2009(e), submits this statement summarizing how InterCarrier's operating procedures are designed to ensure compliance with the Commission's CPNI rules. The company provides exclusively broadband (backhaul) services to large enterprises and, primarily, to other carriers. This statement summarizes the procedures that the company has implemented to safeguard the CPNI of its respective customers.

USE OF CPNI

InterCarrier values its customers' privacy and takes measures to ensure that it protects CPNI. It is InterCarrier's policy to protect the confidentiality of its customers' information. InterCarrier does have CPNI, including quantity, technical configuration, type, location and use of telecommunications services provided by the Company. However, this information is only made available to customers in person pursuant to procedures described herein. InterCarrier 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, InterCarrier 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.

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

PROTECTION OF CPNI

As set forth below, InterCarrier has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Requests for information must be sent in writing by the authorized party of record for the customer. InterCarrier responds back in writing, to the authorized customer representative at the primary address of record.

The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed. InterCarrier has an express disciplinary process in place for violation of the company's CPNI policies.

DISCLOSURE OF CPNI OVER THE PHONE

InterCarrier has a process in place for verifying its customers' identity during an in-bound call. InterCarrier does not release call detail information during an in-bound call. InterCarrier does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

In some instances, involving a business customer with a dedicated account representative, the Company has agreements that address authentication procedures for disclosing CPNI that may differ from those described above.

DISCLOSURE OF CPNI ONLINE

InterCarrier does not disclose CPNI online at this time. Should it choose to do so in the future, it will institute authentication procedures to safeguard the disclosure of CPNI online.

DISCLOSURE OF CPNI AT RETAIL LOCATIONS

InterCarrier does not have any retail locations and therefore does not disclose CPNI in-store.

ACTIONS AGAINST DATA BROKERS

InterCarrier has not taken any actions against data brokers in the past year.

NOTIFICATION OF LAW ENFORCEMENT

InterCarrier takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. InterCarrier 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. InterCarrier will maintain a record of the notification in accordance with the Commission's rules.

INFORMATION ABOUT PRETEXTERS

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publicly 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.

ANNUAL CERTIFICATION

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