



February 28, 2018

Via Commission's Electronic Comment Filing System (ECFS)

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

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

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.2009I CPNI Compliance Certification and accompanying statement of the entities immediately listed in the chart below (collectively "Lighttower,") and their respective filer IDs for 2017:

Lighttower Fiber Networks I, LLC	824812
Lighttower Fiber Networks II, LLC	822434
Fiber Technologies Networks, L.L.C.	821688

If there are any questions regarding this filing, please contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fernanda Biehl', written over a circular stamp.

Fernanda H. Biehl
Senior Director, Regulatory Affairs
Crown Castle Fiber

cc:



Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification - EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 28, 2018

Name of the company covered by this certification: Lighttower Fiber Networks I, LLC

Form 499 Filer ID: 824812

Name of signatory: David L. Mayer

Title of signatory: EVP, General Counsel

Certification:

I, David L. Mayer, certify that I am an officer of Lighttower Fiber Networks I, LLC ("LFN-I") and acting as an agent of LFN-I, that I have personal knowledge that LFN-I 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 LFN-I's procedures ensure that LFN-I 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.

LFN-I has not taken any actions (i.e., proceedings instituted or petitions filed by LFN-I at either state commissions, the court system, or at the Commission) against data brokers in the past year. LFN-I has no information to report with respect to the processes pretexters are using to attempt to access CPNI. LFN-I's steps taken to protect CPNI are described in the accompanying statement.

Further, LFN-I has not received any customer complaints concerning the unauthorized release of CPNI in its operations in the past year.

LFN-I 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. LFN-I 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

A handwritten signature in dark ink, appearing to read 'David L. Mayer', written over a horizontal line. Below the line, the text 'Fiber Solutions General Counsel' is handwritten in a cursive script.

(Signature of an officer, as agent of the carrier)



Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification - EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 28, 2018

Name of the company covered by this certification: Lighttower Fiber Networks II, LLC

Form 499 Filer ID: 822434

Name of signatory: David L. Mayer

Title of signatory: EVP, General Counsel

Certification:

I, David L. Mayer, certify that I am an officer of Lighttower Fiber Networks II, LLC ("LFN-II") and acting as an agent of LFN-II, that I have personal knowledge that LFN-II 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 LFN-II's procedures ensure that LFN-II 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.

LFN-II has not taken any actions (i.e., proceedings instituted or petitions filed by LFN-II at either state commissions, the court system, or at the Commission) against data brokers in the past year. LFN-II has no information to report with respect to the processes pretexters are using to attempt to access CPNI. LFN-II's steps taken to protect CPNI are described in the accompanying statement.

Further, LFN-II has not received any customer complaints concerning the unauthorized release of CPNI in its operations in the past year.

LFN-II 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. LFN-II 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

A handwritten signature in dark ink, appearing to read 'David L. Mayer', written over a horizontal line.

(Signature of an officer, as agent of the carrier)

Fiber Solutions General Counsel



Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification - EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 28, 2018

Name of the company covered by this certification: Fiber Technologies Networks, L.L.C.

Form 499 Filer ID: 821688

Name of signatory: David L. Mayer

Title of signatory: EVP, General Counsel

Certification:

I, David L. Mayer, certify that I am an officer of Fiber Technologies Networks, L.L.C. ("FTN") and acting as an agent of FTN, that I have personal knowledge that FTN 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 FTN's procedures ensure that FTN 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.

FTN has not taken any actions (i.e., proceedings instituted or petitions filed by FTN at either state commissions, the court system, or at the Commission) against data brokers in the past year. FTN has no information to report with respect to the processes pretexters are using to attempt to access CPNI. FTN's steps taken to protect CPNI are described in the accompanying statement.

Further, FTN has not received any customer complaints concerning the unauthorized release of CPNI in its operations in the past year.

FTN 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. FTN 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

A handwritten signature in black ink, appearing to read 'David L. Mayer', written over a horizontal line.

(Signature of an officer, as agent of the carrier)

Fiber Solutions General Counsel



Annual 64.2009(e) CPNI Certification for 2017

Certifying Companies with Form 499 Filer IDs:

Lighttower Fiber Networks I, LLC	824812
Lighttower Fiber Networks II, LLC	822434
Fiber Technologies Networks, L.L.C.	821688

Certificate to Accompany Annual 47 C.F.R. § 64.2009(e) CPNI Certification – EB Docket No. 06-36

Lighttower Fiber Networks I, LLC, Lighttower Fiber Networks II, LLC and Fiber Technologies Networks, L.L.C. (collectively "Lighttower") submit this accompanying statement to provide an overview on how our procedures ensure that Lighttower is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

1. Compliance with Section 64.2007, approval required for use of customer proprietary network information:

Lighttower provides custom, high-capacity network services to enterprise, government, carrier, and data center customers. Lighttower recognizes that under federal law it has a duty to protect CPNI and customers have a right to such protection. As a matter of customer convenience, Lighttower uses commercially reasonable processes (e.g., account number, billing address, contact name, and identification of services) to authenticate customer representatives that contact Lighttower to request CPNI.

2. Compliance with Section 64.2008, notice required for use of customer proprietary network information:

Lighttower did not share, sell, lease, or otherwise provide CPNI to affiliates, agents, independent contractors, or joint ventures for purposes of marketing any services to existing customers within the period covered by this annual certification and accompanying statement.

Lighttower recognizes that under federal law it has a duty to protect CPNI and customers have a right to such protection. Marketing campaign records using CPNI after obtaining appropriate customer approval would be maintained for a minimum of one (1) year.

3. Compliance with Section 64.2009, safeguards required for use of customer proprietary network information:

Lighttower personnel are trained regarding Lighttower's CPNI policies. Lighttower has a disciplinary process for non-compliance with Lighttower's CPNI policies. Lighttower did not share, sell, lease, or otherwise provide CPNI to affiliates, agents, independent contractors, or joint ventures for purposes of marketing any services to existing customers within the period covered by this annual certification and accompanying statement.



4. Compliance with Section 64.2010, safeguards on the disclosure of customer proprietary network information:

Lightower has measures in place to discover and protect against attempts to gain unauthorized access to CPNI. Lightower uses commercially reasonable processes (e.g., account number, billing address, contact name, and identification of services) to authenticate customer representatives that contact Lightower to request CPNI.

5. Compliance with Section 64.2011, notification of customer proprietary network information security breaches:

Lightower has not experienced any CPNI breaches in its operations during the reporting year. However, Lightower has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, Lightower has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which would be kept for a minimum of two (2) years.