



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

February 22, 2018
Via ECFS Filing

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

RE: Excellus Communications, LLC – 499 Filer ID: 831769
CY 2017 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 Excellus Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant

cc: J. Tate – Excellus (via Email)
tms: FCx1801

Attach.
ST/sp

**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:	Covering calendar year 2017
Name of company(s) covered by this certification:	Excellus Communications, LLC
Form 499 Filer ID:	831769
Name of signatory:	Michael J. Strandell
Title of signatory:	Chief Executive Officer

1. I, Michael J. Strandell, 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.



Michael J. Strandell, Chief Executive Officer
Excellus Communications, LLC

2-15-18
Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance



2-25-12

Excellus Communications, LLC
Statement of CPNI Procedures and Compliance
Calendar Year 2017

Excellus Communications, LLC ("Excellus" or "Company") does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005; accordingly, its use of CPNI for marketing purposes does not require customer approval. The Company maintains a record of all sales and marketing campaigns that use CPNI. If Excellus elects in the future to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Excellus 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. The Company has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. The Company's personnel are only allowed to discuss CPNI with the account holder. Failure to do so would result in disciplinary action and continued violation would result in termination of employment.

All CPNI is maintained in-house on the Company's proprietary network to ensure non-disclosure or improper use by employees and to prevent third parties from gaining access to CPNI. The Company maintains a record of any instances in which CPNI was disclosed or provided to third parties or where third parties obtained access to CPNI.

Excellus does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. 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.

The Company has instituted authentication procedures to safeguard the disclosure of CPNI on-line. All customers are required to establish a login and password without the use of readily available biographical information or account information if they want to have on-line access to their CPNI. Confirmation of the password is emailed to the Customer's email address of record.

Excellus has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. The Company uses the standard "forgotten password" system that sends a new password link to the account holder's email address on file.

Excellus Communications, LLC
Statement of CPNI Procedures and Compliance
Calendar Year 2017
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The Company has procedures in place to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information. Specifically, the Company sends an email to the email address on file that alerts the customer of any changes to their accounts. For those customers who do not have email, the Company sends a text message notification to their telephone number.

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

Excellus has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers, including the date of discovery and notification, a detailed description of the CPNI that was breached and the circumstances of the breach.

The Company has not taken any actions against data brokers in the last year.

Excellus did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2017.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI as noted above.