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February 26, 2019

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

ECFS Electronic Filing

**Re: EB Docket No. 06-36, Certification of CPNI Filing for Calendar Year 2018
Allstream Business US, LLC (FRN 0004257010) and Subsidiary**

Dear Ms. Dortch:

Allstream Business US, LLC and its operating subsidiary Electric Lightwave, LLC dba Allstream hereby submits the Calendar Year 2018 CPNI Certification Filing. Please contact me if you or Commission Staff have any questions regarding this filing.

Sincerely,

/s/ Donna Heaston

Donna Heaston
Corporate Attorney
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Enclosures: Certification
Statement of Compliance

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

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 26, 2019
2. Name of company(s) covered by this certification, including Form 499 Filer IDs:

Allstream Business US, LLC (FRN: 0004257010) and its operating subsidiary:

<u>Company Name</u>	<u>Form 499 Filer ID</u>
Electric Lightwave, LLC.....	808575

3. Form 499 Filer ID: Please see 2., above
4. Name of signatory: Douglas Denney
5. Title of signatory: Vice President, Costs and Policy; Officer Title: Assistant Secretary
6. Certification:

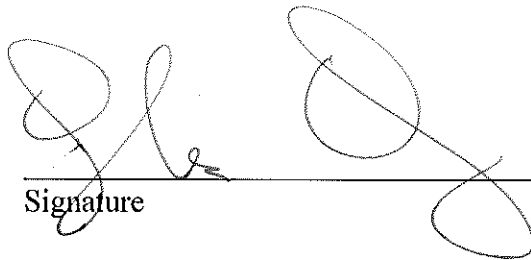
The above named company representative, certifies that he is an officer of the company named above, and, acting as an agent of the company, has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

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 section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any 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 in the past year.

The company 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.


Signature

Douglas Denney
Vice President, Costs & Policy
Assistant Secretary
Allstream Business US, LLC

Attachment: Accompanying Statement explaining CPNI procedures

ALLSTREAM BUSINESS US, LLC 2018 STATEMENT OF COMPLIANCE

The operating procedures of Allstream Business US, LLC and its 2018 operating subsidiary:

Electric Lightwave, LLC dba Allstream

(together, “Allstream” or “Company”) ensure compliance with the FCC’s CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Before soliciting customer consent for the use of CPNI to market the Company’s communication-related services, Allstream gives each customer notice of his or her right to restrict use and disclosure of, and access to, his or her CPNI, in compliance with FCC Rule 64.2008. The Company maintains a record of these notifications for at least one year.

Allstream makes limited, one-time use of CPNI to market our communication-related services only in compliance with FCC Rule 64.2008.

The Company has implemented processes through which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI.

On occasion the Company may access and use its customers’ CPNI to market its own communication-related services only after the customers’ opt-out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. At least every two years the Company provides notice of customers’ rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and solicits opt out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008.

Allstream has a supervisory review process regarding our compliance with the FCC’s CPNI rules for any outbound marketing efforts.

CPNI Safeguards

Allstream has designated a compliance officer to oversee the maintenance and security of the Company’s CPNI records and the direction of the training of all company employees.

Allstream trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and the Company has an express disciplinary process in place if the rules are violated.

The Company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

The Company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer’s request, by sending the CDI to the customer’s address of record; or by calling back the customer at his or her telephone number of record.

The Company discloses CPNI to a customer in person at its local market offices only when the customer presents a valid photo ID and the ID matches the name on the account.

The Company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

The Company has established password protection for customers' online accounts.

The Company has a process in place to notify customers of changes in: a customer password or response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Allstream maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI. The Company maintains these records for at least one year.

Allstream is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

The Company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. The Company may also notify the customer of such breach, after consulting with the investigatory agency(ies), if it believes there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. Allstream will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that the Company postpone disclosure to the customer.

Allstream will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.