



March 1, 2019

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 for Calendar Year 2018

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.20091 CPNI Compliance Certification and accompanying statement of Crown Castle Fiber LLC on behalf of itself and as the successor-in-interest to Lighttower Fiber Networks I, LLC and Fiber Technologies Networks, L.L.C. for year ending December 31, 2018. Please see these entities listed in the chart below with their respective filer IDs.

Crown Castle Fiber LLC (f/k/a Lighttower Fiber Networks II, LLC)	822434
Lighttower Fiber Networks I, LLC	824812
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 blue ink, reading 'Fernanda H. Biehl', is written over a horizontal line.

Fernanda H. Biehl
Mgr. Regulatory Affairs
T: (703) 434-8533
E: PUC.Correspondence@crowncastle.com

cc: Monica Gambino, VP, Legal
Crown Castle

Lisa Gugliada, Deputy General Counsel
Crown Castle Fiber



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

Annual 64.2009(e) CPNI Certification for 2018

Date filed: March 1, 2019

Name of the company covered by this certification: Crown Castle Fiber LLC (on behalf of itself and as the successor-in-interest to Lightower Fiber Networks I, LLC and Fiber Technologies Networks, L.L.C.)

Form 499 Filer ID: 822434 (Crown Castle Fiber LLC); 824812 (Lightower Fiber Networks I, LLC); 821688 (Fiber Technologies Networks, L.L.C.)

Name of signatory: Neil Dickson

Title of signatory: VP, Corporate and Commercial Transactions

Certification:

I, Neil Dickson, certify that I am an officer of Crown Castle Fiber LLC ("CCF") and acting as an agent of CCF, that I have personal knowledge that CCF 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 CCF's procedures ensure that CCF 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.

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

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

CCF 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. CCF 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  VP (Signature of and officer, as agent of the carrier)



Annual 64.2009(e) CPNI Certification for 2018

Certifying Companies with Form 499 Filer IDs:

Crown Castle Fiber LLC (f/k/a Lighttower Fiber Networks II, LLC)	822434
Lighttower Fiber Networks I, LLC	824812
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

Crown Castle Fiber LLC on behalf of itself and as the successor-in-interest to Lighttower Fiber Networks I, LLC and Fiber Technologies Networks, L.L.C. (collectively “CCF”) submit this accompanying statement for year ending December 31, 2018 to provide an overview on how our procedures ensure that CCF 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:

CCF provides custom, high-capacity network services to enterprise, government, carrier, and data center customers. CCF 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, CCF uses commercially reasonable processes (e.g., account number, billing address, contact name, and identification of services) to authenticate customer representatives that contact CCF to request CPNI.

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

CCF 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.

CCF 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:

CCF personnel are trained regarding CCF's CPNI policies. CCF has a disciplinary process for non-compliance with CCF's CPNI policies. CCF 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:

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

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

CCF has not experienced any CPNI breaches in its operations during the reporting year. However, CCF 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, CCF 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.