

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2017
EB Docket 06-36

By

TVC Albany, Inc., d/b/a FirstLight Fiber & Affiliated Companies

41 Street, Box 37, Albany, NY 12207

<u>Names of Companies Covered by this Certification:</u>	<u>499 Filer ID</u>
TVC Albany, Inc.	822400
segTEL, Inc.	825324
Oxford County Telephone & Telegraph Company d/b/a Oxford Long Distance	818608
Oxford West Telephone Company	807625
Oxford Telephone Company	807624
Oxford County Telephone Service Company d/b/a Oxford Networks	820516
Northeast Competitive Access Provider	827055
Freedom Ring Communications, LLC	818330
National Mobile Communications Corp.	821120
Sovernet Fiber Corp.	828655
Sovernet, Inc.	825918
ION HoldCo, LLC	827430
Finger Lakes Technologies Group, Inc.	826559
186 Communications, LLC	830479

I, Jill Sandford, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 companies' procedures ensure that the companies are 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.

The companies have 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.

The companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The companies also acknowledge 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: , Senior VP & General Counsel
Jill Sandford

Dated: 2-26-18

2017 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
by
TVC Albany, Inc., d/b/a FirstLight Fiber & Affiliated Companies
41 Street, Box 37, Albany, NY 12207
February 20, 2018

<u>Names of Affiliated Companies Covered by this Certification:</u>	<u>499 Filer ID</u>
TVC Albany, Inc.	822400
segTEL, Inc.	825324
Oxford County Telephone & Telegraph Company d/b/a Oxford Long Distance	818608
Oxford West Telephone Company	807625
Oxford Telephone Company	807624
Oxford County Telephone Service Company d/b/a Oxford Networks	820516
Northeast Competitive Access Provider	827055
Freedom Ring Communications, LLC	818330
National Mobile Communications Corp.	821120
Sovernet Fiber Corp.	828655
Sovernet, Inc.	825918
ION HoldCo, LLC	827430
Finger Lakes Technologies Group, Inc.	826559
186 Communications, LLC	830479

This statement accompanies the Company's 2017 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the Opt-In approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is

TVC Albany, Inc. and its affiliates, d/b/a FirstLight Fiber

required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.