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ELECTRONIC SUBMISSION VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: SOFTBANK TELECOM AMERICA CORP.
Certification of CPNI Filing
EB Docket No. 06-36**

Dear Ms. Dortch:

SOFTBANK TELECOM AMERICA CORP.,¹ by its undersigned counsel, hereby files the enclosed annual customer proprietary network information compliance statement.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



Joseph A. Godles
Counsel for
SOFTBANK TELECOM AMERICA CORP.

¹ SOFTBANK TELECOM AMERICA CORP. was formerly known as Japan Telecom America, Inc. See Letter from Joseph A. Godles, Counsel for SOFTBANK TELECOM AMERICA CORP., to Marlene H. Dortch, Secretary, FCC, May 9, 2013 (Notification of Change in Licensee Name re: ITC-214-19970307-00139, ITC-214-19970804-00461, ITC-214-20040129-00035).

Customer Proprietary Network Information Compliance Statement
EB Docket No. 06-36

SOFTBANK TELECOM AMERICA CORP. ("STA") is filing this annual customer proprietary network information ("CPNI") compliance statement. Although STA holds Section 214 authorizations permitting it to provide international common carrier services, the Commission's CPNI requirements are inapplicable to STA for the following reasons:

- The CPNI requirements apply to "telecommunications carriers" as defined in Section 3(44) of the Communications Act. *See* 47 C.F.R. § 64.2003(k). Section 3(44) defines a telecommunications carrier as a "provider of telecommunications services," *i.e.*, common carrier services (*see* 47 U.S.C. §153(46)), and states that "[a] telecommunications carrier shall be treated as a common carrier under this [Communications] Act only to the extent that it is engaged in providing telecommunications services."
- STA is not engaged in providing telecommunications services. It has no active common carrier circuits, and all of its services are either information services or non-common carrier services.
- The CPNI requirements also apply to providers of "interconnected VoIP" as defined in 47 C.F.R. § 9.3. STA does not provide interconnected VoIP services.
- Because it does not provide telecommunications services or interconnected VoIP to U.S. customers, STA does not have access to, or use in any way, CPNI as defined by Section 222(h)(1) of the Communications Act. *See* 47 U.S.C. § 222(h)(1).