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March 1, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Cablevision Lightpath, Inc.; Cablevision Lightpath NJ, LLC d/b/a/ Optimum
Lightpath; Cablevision Lightpath CT, LLC d/b/a/ Optimum Lightpath
Annual Customer Proprietary Network Information (“CPNI”) Certification
EB Docket No. 06-36
REDACTED FOR PUBLIC INSPECTION**

Dear Ms. Dortch:

On behalf of Cablevision Lightpath, Inc., Cablevision Lightpath NJ, LLC d/b/a/
Optimum Lightpath, and Cablevision Lightpath CT, LLC d/b/a/ Optimum Lightpath
(collectively, “Lightpath”) and pursuant to Section 64.2009(e) of the Commission’s rules,^{1/}
please find attached Lightpath’s Annual CPNI Certification covering calendar year 2018.

The confidential version of this filing is being submitted concurrently by hand delivery,
under separate cover.

Should you have any questions, please contact the undersigned at 202-434-7440.

Respectfully submitted,

/s/ Radhika Bhat

Radhika Bhat
*Counsel to Cablevision Lightpath, Inc., Cablevision
Lightpath NJ, LLC, and Cablevision Lightpath CT,
LLC*

^{1/} 47 C.F.R. § 64.2009(e).

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CABLEVISION LIGHTPATH, INC.

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB DOCKET 06-36

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

Name of Companies: Cablevision Lightpath, Inc.
Cablevision Lightpath NJ, LLC d/b/a Optimum Lightpath
Cablevision Lightpath CT, LLC d/b/a Optimum Lightpath

Form 499 Filer IDs: Cablevision Lightpath, Inc.: 809451
Cablevision Lightpath NJ, LLC d/b/a Optimum Lightpath: 819612
Cablevision Lightpath CT, LLC d/b/a Optimum Lightpath: 820423

Name of Signatory: Matthew Grover

Title of Signatory: EVP – President, Altice Business Services

I, Matthew Grover, certify that I am an officer of the companies named above (“Company”), 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 Federal Communications Commission’s (“Commission’s”) Customer Proprietary Network Information (“CPNI”) rules. *See* 47 C.F.R. § 64.2001 *et seq.*

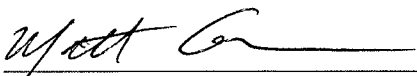
Attached to this certification is an accompanying statement explaining how the Company’s procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission’s rules. *See* 47 C.F.R. § 64.2009(e).

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers during the above-referenced certification period. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company’s operating procedures for compliance with the Commission’s CPNI rules.

[BEGIN REDACTED]

[END REDACTED]

Dated: 2/25/19

Signed: 
Matthew Grover
EVP – President, Altice Business Services
Cablevision Lightpath, Inc.
Cablevision Lightpath NJ, LLC
Cablevision Lightpath CT, LLC

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STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

Cablevision Lightpath, Inc., Cablevision Lightpath NJ, LLC, and Cablevision Lightpath CT, LLC (collectively, "the Company") are committed to protecting the privacy of its customers' confidential and proprietary information and has established operating procedures to protect CPNI. The following statement explains the internal procedures of the Company to ensure that it is in compliance with the CPNI rules of the Federal Communications Commission ("Commission" or "FCC").

A. Use of CPNI

1. The Company uses CPNI for the purpose of providing a customer with the requested service. The Company also uses CPNI for various purposes permitted by law. For example, the Company may use, disclose or permit access to CPNI:
 - a. to initiate, render, bill, and collect for its telecommunications services;
 - b. to protect the rights or property of the Company, or to protect users of those services and other services providers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
 - c. to provide inbound telemarketing, referral, or administrative services to the customers for the duration of the call, if such call is initiated by the customer and the customer approves of the use of such CPNI to provide such service;
 - d. for purpose of providing carrier premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion;
 - e. for the provision of inside wiring, installation, maintenance, repair services;
 - f. to market services within the categories of service to which the customer already subscribes; and
 - g. to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provider directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

2. The Company does not use, disclose, or permit access to CPNI to market service offerings that are within a category of service to which the customer does not already subscribe from the Company, unless the Company obtains proper customer approval in accordance with Commission rules and regulations. The Company does not use CPNI to identify or track customers that call competing service providers.

B. Protection of CPNI

3. The Company serves business customers only and, therefore, the Company requires that each business customer have a contractual arrangement that addresses the protection of CPNI as well as a dedicated account representative. While the Company may provide access to some forms of CPNI according to the terms of the arrangements with each business customer, the Company does not provide Call Detail Record ("CDR") information over the phone to business customers who contact the Company. However, if a business customer properly identifies a call, the Company may assist the business customer with regard to that particular call and will not release any other CDR information. Additionally, the

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Company does not provide access to CPNI online unless the business customer provides a valid password.

C. Law Enforcement and Required Disclosures

4. The Company must disclose outgoing CDR CPNI upon affirmative written request by the business customer to any person designated by the business customer. The business customer's written request will be verified by the Company. All written business customer requests for outgoing CDR CPNI are processed by the Company's Customer Care Department. All valid subpoenas or other legal process for CDR CPNI are processed by the Company's Subpoena Compliance Department.

5. Within 7 days of a reasonable determination of breach (*i.e.*, when a third party intentionally gained access to, used or disclosed CPNI without customer authorization), the Company will notify the U.S. Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni.

- After 7 days of USSS and FBI notice, if the Company has not received written direction from USSS or FBI, the Company will notify the customer of the breach, unless the USSS and FBI have extended the period for such notice.
- For 2 years following USSS and FBI notice, the Company will maintain a record of: (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates the Company notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.
- If there is a possibility of immediate and irreparable harm, the Company may notify the customer immediately after consultation with law enforcement.

D. Training, Recordkeeping and Enforcement

6. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

7. In the event that the Company uses CPNI for sales or marketing campaigns, the Company will maintain a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

8. The Company maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review.

9. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.