

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

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

1. Date filed: March 1, 2019
2. Name of Company covered by this certification: DQE Communications LLC
3. Form 499 Filer ID: 822838
4. Name of signatory: James W. Morozzi
5. Title of signatory: President & CEO
6. Certification:

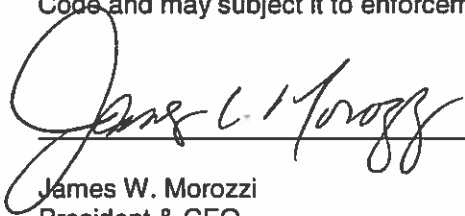
I, James W. Morozzi, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et 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 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 Company has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (e.g., through news media), regarding the processes pretexters are using to attempt to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

The Company has not received 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.



James W. Morozzi
President & CEO
DQE Communications LLC

Attachment: Accompanying statement explaining CPNI procedures

Attachment
Customer Proprietary Network Information Certification
DQE Communications LLC
Form 499 Filer ID 822838

DQE Communications LLC (the Company) has established procedures and safeguards for use of certain customer proprietary network information (CPNI) to ensure that it is in compliance with the section 64.2009 of the Federal Communications Commission's (FCC) rules pertaining to CPNI.

The Company provides managed Ethernet services for non-voice data communications and Internet access to non-residential customers. The Company does not provide telephony or local interexchange carrier services. The Company has filed Tariffs in the states in which it operates.

The Company uses CPNI for the following purposes: servicing its customers; effectively managing its business operations; and meeting regulatory and compliance obligations. The Company notifies its customers about its CPNI practices, and enables customers to add or remove restrictions on the Company's use of their CPNI. The Company does not use, disclose, or permit access to CPNI to market services to customers outside of the category of service to which the customer already subscribes once the customer has enabled such restrictions.

The Company's policy is not to share, sell, lease or otherwise provide CPNI to third parties or affiliates for marketing purposes. The Company will disclose CPNI to a third party only when required by a lawfully issued government subpoena or pursuant to appropriate non-disclosure agreements.

The Company has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain organizations within the Company are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (e.g., to take an order, resolve a billing question, or resolve a service trouble report). In turn, those organizations that are authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI.

The Company engages a public accounting firm to test the logical and physical access controls related to the trust principle of security as a component of a Service Organization Controls audit.

The Company distributes to and trains its employees on its Customer Proprietary Network Information Policy as well as its Policies for Ethical Conduct. These policies provide guidance in protecting company property and assets, including confidential information on customers, and the non-disclosure of that information. An express disciplinary process is in place for violation of these policies.

The Company requires management approval for all sales and marketing campaigns. The Company does not use CPNI for general marketing campaign purposes and therefore does not have records to maintain regarding campaigns that use CPNI.

The Company has established procedures and a supervisory review process designed to ensure compliance with the FCC's CPNI rules. In the event of a breach of CPNI, the Company will comply with all applicable breach notification laws. The Company will maintain a record of the notification in accordance with the FCC's rules.

The Company has designated an officer, as an agent for the Company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).