

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2017**

Date Filed: March 1, 2018

Name of Company(s) Covered by this Certification: **Windstream Services, LLC's subsidiaries. Please see Attachment A, Appendix 1 for a list of the companies covered by this certification.**

Form 499 Filer ID: **Please see Attachment A, Appendix 1 for a list of the Form 499 Filer IDs assigned to each company.**

Name of Signatory: Kristi Moody

Title of Signatory: General Counsel and Corporate Secretary

I, Kristi Moody, certify that I am an officer of the companies named above, and acting as an agent of those companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attachment A to this certification is a statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what step companies are taking to protect CPNI.

In 2017, the companies received no customer complaints 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 be subject to enforcement action.

Signed: _____



ATTACHMENT A

WINDSTREAM SERVICES, LLC SUBSIDIARIES STATEMENT OF CPNI COMPLIANCE PROCEDURES

Windstream Services, LLC and its pertinent subsidiaries¹ (collectively “Windstream”) has a policy of providing regular CPNI notices to all customers and obtains approval from all customers to use CPNI for marketing purposes. Windstream also provides existing customers with the ability to change or rescind their consent to the company’s use of their CPNI at any time. Windstream’s CPNI notices explain the customers’ CPNI rights in accordance with the FCC’s CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from Windstream that is based upon Windstream’s use of their CPNI. From time to time, Windstream may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. Windstream maintains records of customer approval and the delivery of its CPNI notices for at least one year.

Windstream has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use or disclosure of that customer’s CPNI unless, as discussed below, a one-time approval of CPNI is obtained, Windstream representatives who market using CPNI, review this status and refrain from marketing to customers with a CPNI restricted account.

In accordance with the CPNI rules, upon obtaining a customer’s oral authorization, customer service representatives of Windstream may access a customer’s CPNI during the course of an inbound or outbound telephone conversation. Each such Windstream representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

Windstream may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Windstream, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

Windstream does not sell or lease CPNI to any third parties. Windstream only shares CPNI with third parties consistent with federal and state law and regulation.

Windstream maintains a record for at least one year of its own and affiliates’ sales and marketing campaigns that use customers’ CPNI. Windstream has established a supervisory

¹ Pertinent subsidiaries are described in Appendix 1 to this Statement.

review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. Further, Windstream has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations.

All Windstream employees who have access to CPNI receive training about CPNI compliance. Specifically, all new customer service employees are provided with CPNI training. Moreover, Windstream's confidentiality policies are included in training that all employees receive and are required to acknowledge in writing. All Windstream employees are required to maintain the confidentiality of CPNI consistent with federal and state law and regulation. Employees who do not abide by these policies or otherwise improperly permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

Windstream has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly, as required by FCC rules.

Windstream has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Windstream will notify affected customers after waiting the requisite timeframe. Windstream will maintain a record of any CPNI-related breaches for a period of at least two years.

Windstream has implemented procedures whereby it will not provide CPNI without proper customer authentication. Windstream uses a variety of methods to authenticate a customer's identity prior to disclosing CPNI. These methods vary depending on the type of CPNI to be disclosed and are consistent with FCC rules. In addition, Windstream has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that is also consistent with FCC rules. Windstream has implemented procedures to inform the primary contact of any change of address, e-mail or if additional customer employees are seeking access to account information in a manner that conforms with the relevant rules.

APPENDIX 1

WINDSTREAM SERVICES, LLC SUBSIDIARIES SUBJECT TO ITS STATEMENT OF CPNI COMPLIANCE PROCEDURES

Windstream Services, LLC's Statement of CPNI Compliance Procedures apply to subsidiaries associated with the following FCC Form 499 Filer IDs:

Form 499

<u>Filer ID</u>	<u>Form 499 Filer ID Name</u>
801606	Windstream Montezuma, LLC
801714	Windstream Lexcom Communications, LLC
801717	Windstream Lexcom Long Distance, LLC
802014	Windstream NTI, LLC
802035	Windstream Systems of the Midwest, Inc.
802036	Windstream of the Midwest, Inc.
802434	Windstream Nebraska, Inc.
802491	Windstream Norlight, LLC
802581	Windstream Conestoga, Inc.
803136	EarthLink Carrier, LLC
804615	Windstream Accucomm Telecom, LLC
804681	Windstream D&E, Inc.
804682	D&E Networks, Inc.
805033	Oklahoma Windstream, LLC
805035	Windstream Alabama, LLC
805044	Windstream Missouri, LLC
805059	Windstream South Carolina, LLC
805062	Windstream Georgia, LLC
805074	Windstream New York, Inc.
805077	Windstream Sugar Land, LLC
805080	Windstream Florida, LLC
805083	Windstream Arkansas, LLC
805086	Windstream Ohio, LLC
805089	Windstream North Carolina, LLC
805092	Windstream Pennsylvania, LLC
805095	Windstream Western Reserve, LLC
805102	Windstream Georgia Communications, LLC
805105	Georgia Windstream, LLC
805122	Windstream Mississippi, LLC
805134	Windstream Oklahoma, LLC
805140	Texas Windstream, LLC
805149	Windstream Kentucky West, LLC
807705	Windstream Communications Kerrville, LLC
808110	Windstream Buffalo Valley, Inc.
808203	Windstream Georgia Telephone, LLC
808239	Windstream Lakedale, Inc.

Form 499**Filer ID****Form 499 Filer ID Name**

808240	Windstream Lakedale Link, Inc.
808467	Windstream Concord Telephone, LLC
808794	ATX Licensing, Inc.
	ATX Telecommunications Services of VA, LLC
809320	Windstream Standard, LLC
	McLeodUSA Telecommunications Services, LLC
809572	Infocore, Inc.
809692	Windstream Kerrville Long Distance, LLC
812933	Windstream KDL, LLC
815924	PaeTec Communications, LLC
818024	Windstream Direct, LLC
819728	Valor Telecommunications of Texas, LLC
820011	Windstream EN-TEL, LLC
820087	EarthLink Business, LLC & subsidiaries:
820304	Business Telecom, LLC
	Choice One Communications of Connecticut, Inc.
	Choice One Communications of Maine, Inc.
	Choice One Communications of Massachusetts, Inc.
	Choice One Communications of New York, Inc.
	Choice One Communications of Ohio, Inc.
	Choice One Communications of Pennsylvania, Inc.
	Choice One Communications of Rhode Island, Inc.
	Choice One Communications of Vermont, Inc.
	Choice One of New Hampshire, Inc.
	Choice One Communications Resale, LLC
	Connecticut Broadband, LLC
	Connecticut Telephone and Communication Systems, Inc.
	Conversent Communications of Massachusetts, Inc.
	Conversent Communications of Connecticut, LLC
	Conversent Communications of Maine, LLC
	Conversent Communications of New Hampshire, LLC

Form 499**Filer ID****Form 499 Filer ID Name**

	Conversent Communications of New Jersey, LLC
	Conversent Communications of New York, LLC
	Conversent Communications of Pennsylvania, LLC
	Conversent Communications of Rhode Island, LLC
	Conversent Communications of Vermont, LLC
	Conversent Communications Resale, LLC
	CTC Communications Corp.
	CTC Communications of Virginia, Inc.
	Deltacom, LLC
	Lightship Telecom, LLC
	US Xchange of Illinois, LLC
	US Xchange of Indiana, LLC
	US Xchange of Michigan, LLC
	US Xchange of Wisconsin, LLC
820376	Windstream D&E Systems, LLC
820387	Eureka Telecom, Inc.
	A.R.C. Networks, Inc.
	Eureka Telecom of VA, Inc.
	InfoHighway of Virginia, Inc.
820454	Cavalier Telephone, LLC
820463	Windstream Iowa Communications, LLC
821094	Windstream Communications Telecom, LLC
821372	Intellifiber Networks, LLC
821560	Windstream Iowa-Comm, LLC
821876	Windstream Lexcom Wireless, LLC
821878	Windstream Southwest Long Distance, LLC
822108	BridgeCom International, Inc.
	TruCom Corporation
822508	Windstream Kentucky East, LLC
822848	Talk America, Inc. - CONSOLIDATED
823964	US LEC Corp. - CONSOLIDATED
824088	Broadview Networks, Inc.
	Broadview NP Acquisition Corp.
	Broadview Networks of Virginia, Inc.
824758	EarthLink, LLC
825434	Windstream NuVox, LLC
825534	Windstream-IT-Comm, LLC
825732	Windstream Communications, LLC
825929	PaeTec iTel, LLC

Form 499**Filer ID**

826491

827845

Form 499 Filer ID Name

Windstream Lexcom Entertainment, LLC

Windstream NorthStar, LLC