

April 13, 2018

Federal Communications Commission
Office of the Secretary
Attn: Chief, Pricing Policy Division
Room 5-A225
445 12th Street SW
Washington, DC 20554

**Re: 2018 Annual Certification Section 254(g)- Rate Integration & Deaveraging
Certification CC Docket No. 96-61**

Ms. Dortch:

On behalf of Peerless Networks, Inc. in accordance with 47 C.F.R. 64.1900 of the Commission's rules, please find the attached certification. This document is being filed in order to certify compliance with the geographic rate averaging and rate integration requirements of Section 254(g) of the Act, pursuant to 47 C.F.R 64.1900 of the Commission's rules.

Should you have any questions regarding this filing, please do not hesitate to contact us.

Respectfully submitted,

Alisha Garland

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