



April 30, 2019

Federal Communications Commission  
Office of the Secretary  
Attn: Chief, Pricing Policy Division  
Room 5-A225  
445 12<sup>th</sup> 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,

**Sam Allen**

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