RGTS Rockefeller Group Technology Solutions

February 6, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36
RGT Utilities, Inc. (499 Filer ID 808668)
RGT Utilities of California, Inc. (499 Filer ID 823312)
Rockefeller Group Communications, Inc. (499 Filer ID 828224)

Dear Ms. Dortch:

RGT Utilities, Inc., RGT Utilities of California, Inc. and Rockefeller Group Communications, Inc.[1] (collectively, "RGT") hereby submit this letter to notify the Commission that, for the reasons stated herein, RGT is exempt from filing a certification regarding compliance with the rules governing Customer Proprietary Network Information ("CPNI").

The Commission adopted its CPNI certificate filing requirement in its EPIC CPNI Order, wherein it amended various sections of its CPNI rules, including Section 64.2009(e), which now requires telecommunications carriers subject to its CPNI rules to file annual compliance certifications.[2] The EPIC CPNI Order contains an exemption for carriers that employ service contracts with business customers that address protection of CPNI and use dedicated account representatives as primary contacts for their business customers ("Business Customer Exemption").[3]

RGT qualifies for the Business Customer Exemption. Specifically RGT: (a) serves business customers exclusively; (b) utilizes customer service agreements that contain CPNI protection terms; and (c) employs dedicated account representatives as principal contacts for its customers.[4] RGT Utilities, Inc. and RGT Utilities of California, Inc. so informed the

---

[1] Rockefeller Group Communications, Inc. commenced business in 2010. Consequently, that entity was not included in filings for prior years.

[2] See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007), ¶¶ 51-53 ("EPIC CPNI Order").

[3] Id. at ¶ 25.

[4] RGT's customers are able to reach their account representatives without going through a call center.

Commission in letters submitted to the Enforcement Bureau on September 16, 2008;[5] however, out of an abundance of caution RGT is notifying the Commission that RGT's representations in those letters remain accurate and are equally applicable to Rockefeller Communications Group, Inc., and that all of the RGT companies qualified for the Business Customer Exemption throughout 2011.

Although the Business Customer Exemption exempts RGT from the rules adopted in the EPIC CPNI Order, RGT remains committed to protecting its customers' CPNI in compliance with Section 222 of the Communications Act of 1934, as amended[6] and applicable FCC rules.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact RGT's counsel, Frederick M. Joyce, at (202) 344-4653.

Respectfully submitted,

RGT Utilities, Inc.
RGT Utilities of California, Inc.
Rockefeller Communications Group, Inc.

By: _____
Name: Robert C. Paul
Title: Vice President
Chief Administrative Officer

[5] *See* Letter to Marcy Greene, Deputy Chief, Response to CPNI Compliance Inquiry by RGT Utilities, Inc., File No. EB-08-TC-5139 (via e-mail, Sept. 16, 2008); Letter to Marcy Greene, Deputy Chief, Response to CPNI Compliance Inquiry by RGT Utilities of California, Inc., File No. EB-08-TC-5138 (via e-mail, Sept. 16, 2008).
[6] 47 U.S.C. § 222.