

# Holland & Knight

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## ELECTRONIC FILING

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February 18, 2015

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

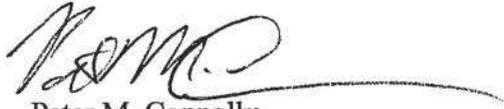
RE: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2014**  
**RouteSource Telecom, LLC**

Dear Ms. Dortch:

Transmitted herewith, on behalf of RouteSource Telecom, LLC, is its 2014 CPNI Certification and Accompanying Statement for filing in the above-referenced docket.

In the even there are any questions in connection with this filing, please communicate with the undersigned.

Very truly yours,



Peter M. Connolly

Enclosures

cc: Best Copy and Printing, Inc. via electronic mail

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: 2/18/2015
2. Name of company(s) covered by this certification: RouteSource Telecom, LLC
3. Form 499 Filer ID: 828625
4. Name of signatory: Jay Rosenblatt
5. Title of signatory: Chief Executive Officer
6. Certification:

I, Jay Rosenblatt, 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.*

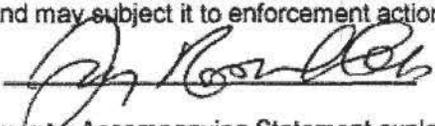
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *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 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.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

## **Statement Accompanying CPNI Certification**

RouteSource Telecom, LLC ("RouteSource") hereby explains how its procedures comply with the requirements set forth in Section 64.2001 et seq. of the FCC's Rules.

RouteSource provides an Internet protocol based service to United States and foreign telecommunications carriers, delivering and carrying voice and data traffic to them on a "carrier's carrier" basis. RouteSource also provides similar services to IP based "softphone" providers in the United States and foreign points. RouteSource recently purchased its own switching facility.

At present, RouteSource has no information about the data transmitted on the circuits it resells. Accordingly, in connection with its service, RouteSource does not collect and thus does not possess any of the information defined as Customer Proprietary Network Information ("CPNI") in Section 222(f) of the Communications Act.

RouteSource has, however, instituted policies designed to protect the confidentiality of all customer information. All members of its staff have been instructed that customer information is confidential and is not to be shared with anyone outside RouteSource, except customers in the normal course of business. Should the nature of RouteSource's business be expanded to encompass the collection of CPNI, RouteSource will implement all necessary procedures to comply with FCC CPNI requirements.