Long Distance Savings Solutions
717 South Wells Street, Suite 700
Chicago, IL 60607

February 25, 2015

Via ECFS Electronic Filing

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

RE: 2014 Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), enclosed for filing with the Federal Communications Commission ("Commission") is the Customer Proprietary Network Information ("CPNI") compliance certificate of Long Distance Savings Solutions, LLC ("Company") as well as the Company's statement of compliance with the Commission's CPNI rules.

If you have any questions concerning this matter, please contact me via email at jbullock@longdistancesavingssolutions.com.

Respectfully submitted,

John Bullock
VP and Authorized Manager

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

Annual 64.2009(e) CPNI Certification for 2014

Date filed: February 27, 2015

Name of company covered by this certification: Long Distance Savings Solutions, LLC

Form 499 Filer ID: 825854

Name of signatory: John Bullock

Title of signatory: Vice President and Authorized Manager

I, John Bullock, certify that I am an authorized manager of the company named above and file this response acting as an agent of the company (the "Company"). The Company is a private carrier and therefore does not need to comply with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq. Notwithstanding that the Company is not required to comply with such rules, I nonetheless certify that 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 (1) that the Company is a private carrier and (2) how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any 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 any 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 _____

John Bullock
Vice President and Authorized Manager
Long Distance Savings Solutions, LLC

STATEMENT REGARDING OPERATION AS A PRIVATE CARRIER AND OF COMPLIANCE WITH CPNI RULES

Long Distance Savings Solutions, LLC (the "Company") provides only transport services to its parent, to interconnect its parent's switches with the switches of third parties. Since the Company's only customer throughout 2014 was its parent and for a variety of other reasons, the Company only provided private carrier service during 2014. Thus, the Company was not a "telecommunications carrier" during 2014 for purposes of Subpart U of the Commission's rules, and was not required to file a compliance certificate.

Notwithstanding that the Company need not provide a CPNI certification, the Company does comply with CPNI requirements. The Company has elected to utilize or provide CPNI only for marketing purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Thus, except as described below, the Company does not use CPNI for marketing purposes in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. For example, the Company uses, discloses or permits access to CPNI for marketing purposes in the context of marketing its offerings to existing customers. Thus, the Company may use CPNI to market a higher capacity circuit to a customer that is over-utilizing its existing lower capacity circuit(s). In addition, as permitted by the CPNI rules, the Company uses CPNI (1) to initiate, render, and bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services.

The Company has implemented processes and procedures to train its personnel (if any) as to when they are and are not permitted to use CPNI. For instance, all Company employees (if any) are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. In addition, designated employees with access to CPNI are also required to abide by the Company's CPNI Protection Policy. Employees who violate either the Company's Code of Conduct or CPNI Protection Policy may be subject to discipline, including possible termination.

The Company has not adopted procedures with respect to the failure of opt-out mechanisms because, as explained above, the Company does not engage in any marketing that would require such consent. But, in the event the Company modifies its marketing practices, the Company will adopt such procedures in conformity with the rules.

The Company does not use independent contractors to engage in marketing efforts on behalf of the Company nor do third parties have access to CPNI except as detailed above.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns based on CPNI. A significant amount of the Company's marketing is focused on existing customers in areas where the Company has built new facilities and, when CPNI is used, is limited to those instances where customer approval is not required as detailed above.

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

The Company has implemented procedures whereby it will not provide CPNI without proper customer authentication. In order to authenticate a customer's identity prior to disclosing CPNI, the Company authenticates the customer using a variety of methods. Call detail records are provided on-line or via e-mail, U.S. mail or overnight business courier.