Morgan, Lewis & Bockius LLP
2020 K Street, NW
Washington, District of Columbia 20006-1806
Tel. 202.373.6000
Fax: 202.373.6001
www.morganlewis.com

Morgan Lewis
COUNSELORS AT LAW

Douglas D. Orvis II
Partner
+1.202.373.6041
douglas.orvis@morganlewis.com

February 27, 2015

Via ECFS

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

Re: Wilshire Connection, LLC - Filer ID 829076
Annual CPNI Compliance Certification - CY 2014
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Wilshire Connection, LLC (the "Company"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's calendar year 2014 CPNI Certification.

Respectfully submitted,

/s/ Douglas D. Orvis II

Douglas D. Orvis II

Counsel for Wilshire Connection, LLC

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: February 27, 2015

2. Name of company covered by this certification: Wilshire Connection, LLC

3. Form 499 Filer ID: 829076

4. Name of signatory: Glenn Nieves

5. Title of signatory: Vice President – General Counsel, Government Affairs and Corporate Secretary

6. Certification

I, Glenn Nieves, 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, safeguards, recordkeeping, and supervisory review) 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, in state commissions, the state or federal court systems, or at the Commission) 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 them to enforcement action.

Glenn Nieves, Vice President – General Counsel, Government Affairs and Corporate Secretary
Wilshire Connection, LLC

Attachments: Accompanying Statement explaining CPNI procedures

WILSHIRE CONNECTION LLC
STATEMENT OF CPNI COMPLIANCE PROCEDURES

Wilshire Connection, LLC ("WILCON") provides wholesale services to other carriers including last mile and dark fiber connectivity and transport facilities, as well as collocation services.

WILCON only has access to limited forms of CPNI from its wholesale carrier customers and has adopted various operational procedures to assure that, consistent with the Commission's rules, all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

Consistent with the CPNI rules, WILCON may use, disclose and permit access to CPNI without customer approval (1) to render, bill and collect for services provided (2) to protect rights or property of WILCON, other users or other carriers from unlawful use; and (3) for the purpose of network maintenance, repair and troubleshooting.

WILCON does not use, disclose or permit access to CPNI for marketing purposes other than for the purpose of providing service offerings for the type of services to which WILCON'S customer already subscribes. It is therefore not required to seek approval from existing customers to use their CPNI and does not maintain a record of a customer's approval to use CPNI. In the event WILCON changes its marketing practices or expands its service offerings so that customer approval is required, it will implement a system by which customers will be notified of such use and the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Furthermore, WILCON does not share, sell, lease and otherwise provide CPNI to any of suppliers, vendors and any other third parties for the purposes of marketing any services. WILCON does not have any affiliates.

WILCON has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all WILCON personnel receive CPNI training and are required to abide by the Company's CPNI policy, which, *inter alia*, requires personnel to maintain the confidentiality of all information, including CPNI, that is obtained as result of the work they perform for WILCON. WILCON personnel who violate the Company's CPNI policy will be subject to discipline, including possible termination.

To the extent WILCON engages in any marketing campaigns, it has established a supervisory review process to ensure that such campaigns are consistent with the FCC's CPNI rules. WILCON maintains a record for at least one year of its own and, if applicable, affiliates' sales and marketing campaigns, if any, that use customers' CPNI.

WILCON does not provide CPNI without proper customer authentication on inbound telephone calls and only discusses over the phone call detail information that is provided by the customer. With respect to call detail information, the Company may use information in switch records that are generated when WILCON provides transport and other connectivity services to bill for its services. The information in these switch records is not organized in a manner that would allow WILCON to identify any individual end user customers and WILCON only shares that information with its wholesale customers who are properly authenticated and then only by sending those records to the applicable customer's address of record. All WILCON customers have dedicated account representatives who serve as the primary customer contact. These account representatives personally know each customer. WILCON does not provide online account access for its customers.

If a customer's address changes, WILCON will notify the customer of that change by mailing such notice to the customer's address of record consistent with the FCC's CPNI Rules. Since WILCON

does not offer online account access and does not use passwords or back-up secret questions for lost or forgotten passwords to authenticate its customers, WILCON is not required to notify customers of changes to these items. In the event of a breach of CPNI that is maintained by WILCON, it will provide law enforcement with notice of such CPNI breach. After notifying law enforcement and unless directed otherwise, WILCON will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years as required by the applicable FCC CPNI rules.

In the event that WILCON changes its marketing practices such that opt-out notices are required, the Company will implement procedures whereby it will provide the FCC written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly.