alaska COMMUNICATIONS

February 27, 2015

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

RE: CPNI Certification for ACS Long Distance, LLC
EB Docket No. 06-36

Dear Secretary Dortch:

Enclosed please find the ACS Long Distance, LLC's compliance certificate for the most recent period, along with an accompanying statement explaining how operating procedures ensure compliance with section 64.2009(e) of the Commission's rules.

Please call Lisa Philips, Manager, Regulatory Affairs, at (907) 297-3130 with any comments or concerns.

Sincerely,

ACS LONG DISTANCE, LLC

Lisa Phillips

Lisa Phillips
Manager, Regulatory Affairs

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: **ACS Long Distance, LLC**

Form 499 Filer ID: **0022-3898-60**

Name of signatory: **Mr. David Eisenberg**

Title of signatory: **Senior Vice President and Chief Revenue Officer**

I, David Eisenberg, 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 set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions 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 has safeguards in place to protect CPNI from pretexters, which are further described in the accompanying statement.

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 David Eisenberg

ACS Long Distance, LLC

Statement Explaining Compliance with CPNI Rules for 2014

ACS Long Distance, LLC has the following practices and procedures in place to ensure compliance with the customer proprietary network information ("CPNI") rules of the Federal Communications Commission ("FCC"), 47 C.F.R. § 64.2001-2011, and Section 222 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 222.

- We have implemented safeguards to ensure that the status of a customer's CPNI approval (or absence of approval) is confirmed before CPNI is used in any marketing efforts. *See* 47 C.F.R. § 64.2009(a).
- We regularly train personnel regarding the permissible and impermissible uses of CPNI, have adopted written CPNI policies which are available to employees, and have supervisory and disciplinary processes in place to address any violations of the CPNI rules. *See id.* § 64.2009(b).
- We maintain records of each marketing campaign that makes use of customers' CPNI. Our records are sufficient to describe each campaign, identify the CPNI utilized, and record the instances in which CPNI is disclosed, provided, or made available to third parties for marketing purposes. *See id.* § 64.2009(c).
- We have established a supervisory review process to ensure compliance with CPNI rules in any outbound marketing campaign. Sales personnel must obtain supervisory approval for any proposed new outbound marketing campaign or efforts to obtain customer approval for use of CPNI. *See id.* § 64.2009(d).

- We have implemented systems and processes to establish customer passwords and properly authenticate customers who initiate telephone, online or in-store requests for CPNI prior to the release of any such data. *See* 47 C.F.R. § 64.2010(a)-(e).
- We have established systems and processes to immediately notify customers whenever a password, customer response to a back-up means of authentication, online account, or address of record is created or changed, in accordance with the FCC's rules. *See* 47 C.F.R. § 64.2010(f).
- We retain records of compliance for at least the minimum time periods specified in Part 64 of the FCC's rules.