Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Crown Castle Solutions Corp. CLEC Operating Subsidiaries for 2015

Date filed: February 23, 2015

Name of companies covered by this certification: CA - CLEC LLC; InSITE Solutions LLC; Crown Castle NG Atlantic LLC; Crown Castle NG Central LLC; Crown Castle NG East LLC; Crown Castle NG West LLC; NewPath Networks, LLC, PA - CLEC LLC dba Pennsylvania – CLEC LLC; and WA - CLEC LLC. These companies are all covered under the Consolidated Filing dated March 26, 2013.

Form 499 Filer ID: 829688

Name of signatory: Monica Gambino

Title of signatory: Vice President – Legal

I, Monica Gambino, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 companies' procedures ensure that they are in compliance with the requirements set forth in Sections 64.2001 *et seq*. of the Commission's rules.

The companies have not taken any actions against data brokers in the past year. The companies have no information with respect to the processes pretexters are using to attempt to access CPNI, and what additional steps companies are taking to protect CPNI beyond those required by the Commission.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Monica Gambino

Monica Gambino

Attachment
CPNI Policies and Procedures
Crown Castle International Corporation

1. Crown Castle International Corporation's operating companies (collectively "Crown Castle") are carrier's carriers providing localized intrastate wireless backhaul to other carriers and do not provide telecommunications services directly to end user customers, or are SMR licensees with only a few subscribers each.

2. Crown Castle may use, disclose, or permit third party access to CPNI without prior customer approval, only under limited circumstances. Crown Castle may use, disclose, or permit access to CPNI to provide services to which its customers already subscribe, and it is the current policy of Crown Castle that customers' CPNI will not be provided to any third parties, nor does Crown Castle use or allow third party access to CPNI, in any circumstances in which prior customer approval will be required. Crown Castle also does not currently engage in outbound marketing or cross-marketing that utilizes CPNI, or that otherwise requires prior customer approval.

3. If Crown Castle personnel seek to use CPNI for any sort of marketing purposes, they must first obtain appropriate approval by supervisory management and legal personnel and will comply with applicable recordkeeping requirements. Furthermore, with respect to use, disclosure, and access to CPNI within a Crown Castle customer's total services, all employees, contractors and consultants employed or engaged by Crown Castle are required to sign, as a condition of employment or engagement, statements of confidentiality and non-disclosure pertaining to all confidential proprietary information, including CPNI. Noncompliance with Crown Castle's CPNI policies can subject employees to disciplinary action up to and including termination.

4. CPNI may be used or disclosed to third parties, without customer approval, for the following purposes:

- billing and collection;
- administrative customer care services;
- maintenance and repair services;
- to protect Crown Castle's rights or property, or to protect users of Crown Castle's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
- responding to a lawful law enforcement request for such information; or
- use of aggregate customer information – i.e., collective data relating to a group or category of Crown Castle services or customers from which individual identities and characteristics have been removed.

5. Crown Castle may not disclose CPNI based on customer-initiated contact by telephone or online to any entity without proper authentication. Insofar as Crown Castle is a carrier's carrier it does not have access to its customers' call detail information, but will provide CPNI over the phone only if the customer provides proper authentication. Customers' telephone access to call detail information for the SMR licensees, and online access to their CPNI generally requires a password. Crown Castle does not provide CPNI to customers at the retail store level. Customers are notified via mail to the address of record of changes in account information, including password, backup authentication method, online account or address of record.

6. Crown Castle will timely notify law enforcement and customers of any breach of its customers' CPNI in accordance with FCC rules. Records of any breaches discovered will be maintained for a minimum of two years.

7. Any proposed or desired use of CPNI inconsistent with these Policies and Procedures must be approved by Crown Castle senior management and subject to appropriate legal review to ensure that such use is consistent with FCC rules.

8. All employees and contractors are required to review and acknowledge understanding of this policy in writing on an annual basis.