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February 9, 2016

Filed Electronically Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for Border to Border Communications, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Border to Border Communications, Inc. (499 Filer ID No. 809449) for 2015 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 830-895-7226 or sgatto@gvnw.com with any questions or concerns.

Sincerely,

Steve Gatto
Authorized Representative for
Border to Border Communications, Inc.

cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

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

EB Docket 06-36

Annual Section 64.2009(e) CPNI Certification for 2015

1. Date filed: February 5, 2016

2. Name of Company: Border to Border Communications, Inc.

3. Form 499 Filer ID: 809449

4. Name of signatory: Herman Roark, Jr.

5. Title of signatory: President

6. Certification:

I, Herman Roark, Jr., 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 (See attached Statement of Compliance).

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company does not have any information that pretexters have attempted to gain access to CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals, or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

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 Herman C. Roark Jr.
Herman Roark, Jr., President

Attachment: Statement of CPNI Compliance and Procedures

BORDER TO BORDER COMMUNICATIONS, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For The Year Ending 2015
Form 499 Filer ID: 809449

1. This Statement of Compliance for Border to Border Communications, Inc. ("Border to Border" or "the Company") is attached to and referenced within the Company's 2015 Annual CPNI Certification.

2. Border to Border has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release, or usage of CPNI.

3. The Company has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Company employees.

4. For the year ending 2015, Border to Border is not aware of any incidence involving the access, breach, release, or usage of its CPNI by any unauthorized person or entity; *i.e.*, data brokers or pretexters.

5. For the year ending 2015, Border to Border has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.