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800 Westchester Ave.
Suite N-501
Rye Brook, NY 10573
914-922-7589
Fax 347-287-0223

February 10, 2016

Filed via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification for Calendar Year 2016

Dear Ms. Dortch:

Attached hereto is the Annual 47 C.F.R. §64.2009(e) CPNI Certification and Explanatory Statement of Compliance Procedures of Eureka Telecom, Inc., A.R.C. Networks, Inc., Eureka Telecom of VA, Inc. and InfoHighway of Virginia, Inc., Form 499 Filer ID No. 820387, covering calendar year 2015.

To the extent you have any questions concerning these materials, please do not hesitate to contact the undersigned.

Respectfully submitted,

Charles C. Hunter
Executive Vice President, General Counsel and Secretary

Attachments

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

EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2016,
covering Calendar Year 2015

Date Filed:	February 10, 2015
Name of Companies Covered by this Certification:	Eureka Telecom, Inc. A.R.C. Networks, Inc. Eureka Telecom of VA, Inc. InfoHighway of Virginia, Inc.
Form 499 Filer ID:	820387
Name of Signatory:	Charles C. Hunter
Title of Signatory:	Executive Vice President & General Counsel

I, Charles C. Hunter, certify that I am an officer of each of the companies named above and, acting as an agent of each of the companies, that I have personal knowledge that each of the companies 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 each of the companies' procedures ensure that each of the companies is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.

None of the companies has taken any actions (*i.e.,* instituted a proceeding or filed a petition with either a state commission, a court or the Commission) against data brokers in the past year. None of the companies has any information to report with respect to the processes pretexters are using to attempt to access CPNI. The steps the companies have taken to protect CPNI are set forth in the statement accompanying this certification.

None of the companies has received any customer complaints in the past year concerning the unauthorized release of CPNI.

Each of the companies 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. Each of the companies 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: _____

Charles C. Hunter
Executive Vice President, General Counsel & Secretary
Eureka Telecom, Inc.
A.R.C. Networks, Inc.
Eureka Telecom of VA, Inc.
InfoHighway of Virginia, Inc.

Attachments: Accompanying Statement explaining CPNI procedures

Compliance Procedures

Set forth below is the statement of Eureka Telecom, Inc., A.R.C. Networks, Inc., Eureka Telecom of VA, Inc. and InfoHighway of Virginia, Inc. (collectively, "InfoHighway") in support of their CPNI Certification for 2016 covering calendar year 2015 that each has established operating procedures that are adequate to ensure compliance with the rules set forth in Subpart U of Part 64 of the Commission's Rules and Regulations.

Use, Disclosure and Access to CPNI

- InfoHighway does not disclose or provide access to the customer proprietary network information ("CPNI") of its customers to any third parties other than certain vendors – *e.g.,* underlying carriers – or in response to lawful subpoenas or governmental mandates.

- Vendors who have access to the CPNI of InfoHighway's customers are subject to strict contractual confidentiality requirements.

- InfoHighway does not use its customers' CPNI in sales or marketing campaigns. In the event, however, that customers' CPNI is used in sales and marketing campaigns in the future, InfoHighway has established (i) a supervisory review process to ensure that any such sales or marketing campaign is consistent with the FCC's CPNI rules, and (ii) record keeping capability for such sales and marketing campaigns.

- InfoHighway secures from its customers at the time they contract for service with InfoHighway written authority to use the customers' CPNI in a manner consistent with Subpart U of Part 64 of the Commission's Rules and Regulation. The authorization that is obtained is set forth below:

> **Authorization to Use CPNI:** Customer hereby authorizes Company to use and to disclose and permit access by its affiliates and partners to Customer's customer proprietary network information ("CPNI") in order to enhance Company's ability to offer products and services tailored to Customer's needs. CPNI is information that relates to the quantity, technical configuration, type, destination, and amount of use of the Services by Customer and that is made available to Company solely as a result of Company's provision of the Services to Customer. Under federal law, Company has a duty to protect Customer's CPNI and Customer has the right to prohibit certain uses of its CPNI. Although Customer's authorization to Company to use, disclose and permit access to Customer's CPNI will remain in effect until Customer affirmatively revokes such authorization, Customer may withdraw its authorization at any time simply by notifying Company in

writing. Denial by Customer of authorization to use, disclose and permit access to Customer's CPNI will not affect Company's provision of the Services to Customer.

InfoHighway maintains these authorizations for the duration of the customer's service term with InfoHighway, but in no event less than a year.

- InfoHighway has a policy of providing periodic written CPNI notices to customers.

- InfoHighway provides existing customers with the ability to change or rescind their consent to InfoHighway's use of their CPNI at time.

- InfoHighway has a system by which the status of a customer's CPNI approval can be established prior to the use or disclosure of that customer's CPNI.

- InfoHighway does not use, disclose or permit access to its customers' CPNI to identify or track customers that call competing service providers.

Safeguards Against Disclosure of CPNI to Unauthorized Parties

- InfoHighway allows online access by customers to their CPNI only by password.

- InfoHighway has also established a password system to prevent the unauthorized disclosure of call detail information over the telephone based on a customer-initiated call.

- InfoHighway does not provide call detail information over the telephone based on a customer-initiated call unless a customer provides a password. If a customer cannot provide a password, InfoHighway will send such data to the customer's address of record (physical or e-mail) or provide such data to the customer by calling the customer's telephone number of record.

- InfoHighway has established a means by which customers can change passwords that are lost or forgotten and procedures for informing customers of such changes, as well as other changes to specified account information

- InfoHighway does not maintain any retail locations.

Training and Manuals

- InfoHighway has developed and implemented training modules to ensure compliance with CPNI safeguards.

- InfoHighway has issued a formal CPNI Protection Policy which all employees are required to abide by.
- InfoHighway has appointed a CPNI compliance officer to ensure compliance with and enforcement of CPNI policies and procedures.
- InfoHighway has established a disciplinary process governing misuse of customers' CPNI.

CPNI Breaches

- InfoHighway has established procedures for the timely identification, recording and reporting to law enforcement agencies and customers of breaches of its customers' CPNI.
- InfoHighway has established procedures for maintaining records of breaches of its customers' CPNI for at least two years.
- InfoHighway has established a procedure for notifying the FCC of instances where opt-out processes do not work properly.