February 18, 2016
Via ECFS Filing

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

RE: BullsEye Telecom, Inc. 499 Filer ID 822214
BullsEye Telecom of Virginia, LLC 499 Filer ID 826241
CY 2015 Annual CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009(e) submitted on behalf of BullsEye Telecom, Inc. and its affiliate, BullsEye Telecom of Virginia, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren
Consultant to BullsEye Telecom, Inc. and
BullsEye Telecom of Virginia, LLC

cc: David Bailey - BullsEye Telecom
file: BullsEye Telecom - FCC - CPNI
tms: FCx1601

Enclosures
SW/sp

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2015
Name of Companies covered by this certification:	
BullsEye Telecom, Inc.	**Form 499 Filer ID: 822214**
BullsEye Telecom of Virginia, LLC	**Form 499 Filer ID: 826241**
Name of Signatory:	Peter K. LaRose
Title of Signatory:	Vice President, Secretary and Treasurer

I, Peter K. LaRose, certify and state that:

1. I am Vice President, Secretary and Treasurer of BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC (collectively known as "BullsEye" or "Company") 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*.

2. Attached to this certification as Exhibit A, 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, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

3. 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.

4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

5. 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.

Peter K. LaRose
Vice President, Secretary and Treasurer

2/17/2016
Date

Statement of CPNI Procedures and Compliance

BullsEye Telecom, Inc.
and
BullsEye Telecom of Virginia, LLC

Calendar Year 2015

Attachment

Exhibit A - Accompanying Statement explaining CPNI procedures

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

BullsEye Telecom, Inc.
and
BullsEye Telecom of Virginia, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2015)

BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC, its Virginia operating subsidiary, (collectively known as "BullsEye" or "Company") provide local exchange and long distance services to business customers via traditional wireline, wireless and VoIP technologies. The Company uses the same procedures for all aspects of operations. The Company provides the following as its Statement of CPNI compliance:

The Company uses CPNI, upon occasion, to market services to its Customers. It notifies its Customers of their right to restrict use of, disclosure, and access to their CPNI through opt-in and opt-out notifications. The Company maintains records establishing that notice was provided and whether or not the Customer's opt-in and opt-out instruction was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI. Prior to marketing to existing Customers, the Company filters the list of contacts using a system flag that indicates whether a Customer has opted-in or opted-out of marketing activity. Marketing campaigns to educate Customers on events related to their existing services or to make them aware of new services are done under the supervision of senior staff who specify the Customer lists to be used and how the Customers on the list are to be approached. All marketing and sales contact campaigns are measured and tracked and the records are maintained within the Company for a minimum of one year.

BullsEye bills its Customers directly and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The Company has put into place processes to safeguard its Customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI, including CPNI stored on mobile devices.

Newly hired Customer contact personnel are briefed regarding CPNI. Ongoing training efforts include training documentation available at all times on the Company's Intranet learning portal. Regularly scheduled training includes information regarding the confidentiality of call detail records, Customer authentication procedures, and Company policy not to use, access, release, disclose or destroy customer information in any unauthorized manner, as specified in BullsEye Telecom's Employee Proprietary Information Agreement.

BullsEye Telecom, Inc.
and
BullsEye Telecom of Virginia, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2015)
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Call detail information is provided over the telephone to Customers under specific circumstances. Customers must define an account User Name and Password at the time the Customer account is established. In addition, each Customer must select a secret question and answer upon establishment of an account or when a contact is made. Should a Customer forget or lose the password, such information can be provided to the Customer at the address established when the account was set up. If the Customer cannot provide the correct password or response to any back-up authentication methods the Company requires that a new password be established. If the Customer cannot provide the password or backup authentication question response, and the Customer question does not fall into the exception where the call detail information is provided by the Customer to the Customer Service Representative, then call detail can only be provided by mail to the Customer's address of record, or by calling the Customer at the telephone number of records

The Company has procedures to maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

For on-line account access, BullsEye's authentication and password procedures are in compliance with the applicable rules set forth in 47 C.F.R. Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information. BullsEye maintains Customer privacy and data security in private access/log-in applications by issuing unique IDs in addition to allowing Customers to select their own unique passwords. By combining the ID along with a Customer-selected password, the Company has eliminated the risk of log-in information being decrypted with known factors or personal information by unauthorized users. This security strategy is used on all BullsEye on-line private access systems.

The Company does not have retail locations and therefore does not disclose CPNI in-store.

The Company will notify Customers regarding account changes (without revealing the changed information) including password changes, changes in a response to a back-up means of authentication, changes to an on-line account, or changes or creation of an address of record other than at service initiation, in accordance with FCC rules and requirements.

BullsEye Telecom, Inc.
and
BullsEye Telecom of Virginia, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2015)
(Page 3)

The Company has not taken any actions against data brokers in the last year.

The Company has procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a Customer's CPNI within seven (7) business days, and to notify Customers of the breach. Although none have occurred, the Company will maintain a record of any breaches discovered and notifications made to the United States Secret Service and FBI. The Customer's electronic record will be updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.