February 24, 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: deltathree, LLC - 499 Filer ID 831120**
**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 delathree, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant to deltathree, LLC

file: deltathree - FCC
tms: FCx1602

Enclosures
ST/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 Company covered by this certification:** | **deltathree, LLC** |
| Form 499 Filer ID: | 831120 |
| Name of Signatory: | Paul O. Gagnier |
| Title of Signatory: | Secretary |

I, Paul O. Gagnier, certify and state that:

1. I am Secretary of deltathree, LLC. 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 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, record keeping, 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.

Paul O. Gagnier, Secretary
deltathree, LLC

February 23, 2016
Date

Statement of CPNI Procedures and Compliance

**deltathree, 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**

deltathree, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2015)

deltathree, LLC ("deltathree" or "Company") has adopted a policy governing CPNI use that conforms with the FCC rules. Specifically, deltathree provides regular written CPNI notices to all customers and obtains approval from all customers prior to using CPNI for marketing purposes. deltathree also provides customers with the ability to change or rescind their consent to the Company's use of their CPNI at any time. deltathree has prepared CPNI notices explaining to customers their CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from deltathree that is based upon deltathree's use of their CPNI. If deltathree uses CPNI to market communications-related services outside of those services to which a customer already subscribes, deltathree only does so where the customer has granted approval pursuant to instructions in the CPNI notices. deltathree has adopted a recordkeeping system so as to maintain records of customer approval and the delivery of its CPNI notices for at least one year. deltathree has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI.

deltathree may, as permitted by the CPNI rules, use CPNI without customer approval to (1) provide services (including installation, maintenance, repair, and billing for services) in any category of services to which the customer already subscribes; (2) protect deltathree, its customers, or other parties against fraudulent, abusive or unlawful use of services; (3) publish directories or allow other parties to publish directories; (4) respond to a legal demand for the information (e.g., a subpoena or court order); and (5) market services (including marketing upgrades to basic service) in any category of services to which the customer already subscribes.

deltathree does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services, and doing so is strictly prohibited by deltathree.

deltathree maintains a record for at least one year of its own and affiliates' sales and marketing campaigns that use customers' CPNI should the Company use CPNI for such purposes. deltathree has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules prior to engaging in such campaigns.

All deltathree employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation. Moreover, a summary of deltathree's CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing (on a regular basis) that they have read and understand the information in the Employee Handbook. All deltathree employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by deltathree. Employees who do not abide by these policies or otherwise permit the unauthorized use of disclosure of CPNI will be subject to discipline, including possible termination and legal proceedings.

deltathree has in place procedures to ensure that it will provide written notice to the FCC in conformance with the FCC CPNI rules within five business days of any instance where its opt-out mechanisms do not work properly. deltathree will submit such written notice even if it offers other methods by which its customers may opt-out.

deltathree has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, deltathree will notify affected customers after waiting the relevant time period. deltathree will maintain a record of any CPNI-related breaches for a period of at least two years.

deltathree has implemented procedures whereby it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. In order to authenticate a customer's identity prior to disclosing CPNI, deltathree authenticates the customer using a variety of methods. Call detail records are provided to a customer's email address of record or by calling the customer at the telephone number of record, or, if it is an inbound call, only if the customer provides the password associated with the account. deltathree has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. deltathree has implemented procedures to inform customers of changes to the customer's online account, address of record, or authentication questions established when the password was set up in a manner that conforms with the relevant FCC rules.