



**PATRICK D. CROCKER**  
[patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com)

February 25, 2016

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: Ameraconnect Telecom LLC  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

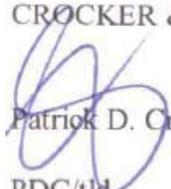
Dear Ms. Dortch:

Ameraconnect Telecom LLC, by its undersigned attorneys, hereby submits its 2015 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER



Patrick D. Crocker

PDC/tld

Enclosures

The Kalamazoo Building | 107 West Michigan Avenue, Fourth Floor | Kalamazoo, Michigan 49007

T 269.381.8893 | F 269.381.4855

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

Date filed: February 25<sup>th</sup>, 2016

Name of Company Covered by this Certification: Ameraconnect Telecom LLC

Form 499 Filer ID: 829935

Name of Signatory: Ronald LaRoe

Title of Signatory: CEO

I, Ronald LaRoe, 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, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

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

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.

This Certification is dated this 25<sup>th</sup> day of February, 2016.

Ronald LaRoe

CEO

Ameraconnect Telecom LLC

## **Customer Proprietary Network Information Certification Attachment A**

Amerconnect Telecom LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("Section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Amerconnect Telecom LLC provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Amerconnect Telecom LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Amerconnect Telecom LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

### **Safeguarding against pretexting**

- Amerconnect Telecom LLC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Amerconnect Telecom LLC is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### **Training and discipline**

- Amerconnect Telecom LLC has an express disciplinary process in place for violation of the Amerconnect Telecom LLC's CPNI practices and procedures. Amerconnect Telecom LLC employees are required to review and abide by Amerconnect Telecom LLC's Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### **Amerconnect Telecom LLC's use of CPNI**

- Amerconnect Telecom LLC uses CPNI for the following purposes:
  - (1) To initiate, render, maintain, repair, bill and collect for services;
  - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - (3) For network maintenance; and
  - (4) As required by law.



- Ameraconnect Telecom LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Ameraconnect Telecom LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- Ameraconnect Telecom LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Ameraconnect Telecom LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### **Additional safeguards**

- Ameraconnect Telecom LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Ameraconnect Telecom LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Ameraconnect Telecom LLC designates one or more officers, as an agent or agents of the Ameraconnect Telecom LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Ameraconnect Telecom LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, Ameraconnect Telecom LLC will comply with all applicable breach notification laws.

A handwritten signature in black ink, appearing to be the initials 'RL' or similar, located in the bottom right corner of the page.