February 29, 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: CY 2015 Annual CPNI Certification – EB Docket No. 06-36**

| | |
|---|---|
| **ACN Communication Services, LLC** | **499 Filer ID: 820854** |
| **ACN Communication Services Virginia, LLC** | **499 Filer ID: 826231** |
| **ACN Digital Phone Service Puerto Rico, LLC** | **499 Filer ID: 827173** |
| **Flash Wireless, LLC** | **499 Filer ID: 828886** |

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 ACN Communication Services, LLC and its affiliates, ACN Communication Services Virginia, LLC, ACN Digital Phone Service Puerto Rico, LLC and Flash Wireless, 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 ACN Communication Services, LLC and Affiliates

cc: T. Oliveira – ACN (via Email)
M. Ginter – ACN (via Email)
file: ACN Comm Serv - FCC
tms: FCx1601

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 Companies covered by this certification:**

| | |
|---|---|
| **ACN Communication Services, LLC** | **Form 499 Filer ID: 820854** |
| **ACN Communication Services Virginia, LLC** | **Form 499 Filer ID: 826231** |
| **ACN Digital Phone Service Puerto Rico, LLC** | **Form 499 Filer ID: 827173** |
| **Flash Wireless, LLC** | **Form 499 Filed ID: 828886** |

Name of Signatory: Paul O. Gagnier

Title of Signatory: Secretary

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

1. I am the Secretary of ACN Communication Services, LLC, ACN Communication Services Virginia, LLC, ACN Digital Phone Service Puerto Rico, LLC and Flash Wireless, LLC (collectively known as "the ACN Companies") and, acting as an agent of the ACN Companies, that I have personal knowledge that the ACN Companies have 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 ACN Companies' procedures ensure that the ACN Companies are 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 ACN Companies have not taken any actions (i.e., proceedings instituted or petitions filed by the ACN Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The ACN Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

5. The ACN Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The ACN Companies also acknowledge 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

FEBRUARY 25, 2016
Date

**ACN Communication Services, LLC**
**and**
**ACN Communication Services Virginia, LLC**
**and**
**ACN Digital Phone Service Puerto Rico, LLC**
**and**
**Flash Wireless, LLC**

**Calendar Year 2015**

Attachments: Exhibit A - Statement of CPNI Procedures and Compliance

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

**EB DOCKET 06-36**

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**ACN Communication Services, LLC**
**and**
**ACN Communication Services Virginia, LLC**
**and**
**ACN Digital Phone Service Puerto Rico, LLC**
**and**
**Flash Wireless, LLC**

**Exhibit A**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (CY 2015)**

ACN Communication Services, LLC, ACN Communication Services Virginia, LLC, its Virginia operating subsidiary, ACN Digital Phone Service Puerto Rico, LLC and Flash Wireless, LLC (collectively known as "The ACN Companies" or "Companies") provide the following as their Statement of CPNI compliance.

ACN Communication Services, LLC and ACN Communication Services Virginia, LLC provide wireline local and long distance telecommunication services to business and residential customers, primarily as bundled services. ACN Communication Services, LLC, along with ACN Digital Phone Service Puerto Rico, LLC, also provides Voice over Internet Protocol ("VoIP") services and customer premises equipment to business and residential customers. Flash Wireless, LLC provides wireless telecommunications services. All of the ACN Companies have the same methods and procedures and operating policies with respect to CPNI, including customer call detail records.

The ACN Companies do not use CPNI to market services to their customers. Therefore, the ACN Companies do not utilize the opt-in or opt-out approval processes. Should the Companies elect to use CPNI in future marketing efforts, they will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The ACN Companies bill customers directly and have taken steps to secure CPNI and manage its release in accordance with FCC rules. The ACN Companies have instituted processes to safeguard customer 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. Customer Service Agents are trained on how to authenticate customers when hired and continually coached on safeguarding customer CPNI.

User account information can only be accessed by authorized representatives of the ACN Companies. Such authorized representatives have access to customer records management systems only via an established password protected account setup in their name by a system administrator. When the ACN Companies' agents take action on a customer's account (e.g. make package changes, billing changes, wrap codes, create cases, etc.) an audit log is created on the account with respect to the actions the agent took on the customer's account. Additionally, access to CPNI used for the purpose of reporting and managing the business is centralized to individuals who have limited password access to customer information through the establishment of a Business Objects database that is populated only with specified customer information.

Call detail information is provided to customers over the telephone pursuant to the procedures identified below. Customers 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. Should a customer forget or lose the password, such information can be provided to the customer at the email address established when the account was set up. 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 physical or electronic address of record or by calling the customer at the telephone number of record.

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

The ACN Companies protect against the unauthorized disclosure of CPNI on the Internet through the establishment of a customer username and password. In addition, each Customer must select a secret question and answer upon establishment of an account. Should a customer forget or lose the password, such information can be provided to the customer at the email address established when the account was set up. If the customer cannot provide the password or backup authentication question response then the customer can contact customer service. Upon the customer's contact with the ACN Companies' customer service department regarding a forgotten password or user name, the customer must provide their email address of record prior to the customer service representative emailing the customer their username and password.

The ACN Companies do not have retail locations and therefore do not disclose CPNI in-store.

The ACN Companies notify customers via a previously established email address, telephone call or mail to the customer address of record, all notifications regarding account changes.

The ACN Companies have not taken any actions against data brokers in the last year.

The ACN Companies have 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. The ACN Companies maintain a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The ACN Companies have not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The ACN Companies have not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.