February 29, 2016
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: EB Docket No. 06-36; CY2015

Atlantic Broadband (CT), LLC	**Form 499 Filer ID: 831128**
Atlantic Broadband (Delmar), LLC	**Form 499 Filer ID: 831131**
Atlantic Broadband (Miami), LLC	**Form 499 Filer ID: 831132**
Atlantic Broadband Enterprise, LLC	**Form 499 Filer ID: 830062**
Atlantic Broadband (Penn), LLC	**Form 499 Filer ID: 831130**
Atlantic Broadband (SC), LLC	**Form 499 Filer ID: 831129**
Atlantic Broadband Finance, LLC	**Form 499 Filer ID: 826014**

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 Atlantic Broadband (CT), LLC, Atlantic Broadband (Delmar), LLC, Atlantic Broadband (Miami), LLC, Atlantic Broadband Enterprise, LLC, Atlantic Broadband (Penn), LLC, Atlantic Broadband (SC), LLC and Atlantic Broadband Finance, 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 Atlantic Broadband Enterprise LLC

file: Atlantic Broadband - FCC - Other
tms: FCx1601

Enclosures
ST/im

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:

Atlantic Broadband (CT), LLC	**Form 499 Filer ID: 831128**
Atlantic Broadband (Delmar), LLC	**Form 499 Filer ID: 831131**
Atlantic Broadband (Miami), LLC	**Form 499 Filer ID: 831132**
Atlantic Broadband Enterprise, LLC	**Form 499 Filer ID: 830062**
Atlantic Broadband (Penn), LLC	**Form 499 Filer ID: 831130**
Atlantic Broadband (SC), LLC	**Form 499 Filer ID: 831129**
Atlantic Broadband Finance, LLC	**Form 499 Filer ID: 826014**

Name of Signatory: Leslie Brown

Title of Signatory: Senior Vice President / General Counsel / Secretary

I, Leslie Brown, certify and state that:

1. I am the Senior Vice President / General Counsel / Secretary of Atlantic Broadband (CT), LLC, Atlantic Broadband (Delmar), LLC, Atlantic Broadband (Miami), LLC, Atlantic Broadband Enterprise, LLC, Atlantic Broadband (Penn), LLC, Atlantic Broadband (SC), LLC, and Atlantic Broadband Finance, LLC (collectively known as (the "Atlantic Broadband Companies") and, acting as an agent of the Atlantic Broadband Companies, I have personal knowledge that the Atlantic Broadband 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 Atlantic Broadband Companies' procedures ensure that the Atlantic Broadband 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 Atlantic Broadband Companies have not taken any actions (i.e., proceedings instituted or petitions filed by the Atlantic Broadband Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

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

5. The Atlantic Broadband 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 Atlantic Broadband 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.

Leslie Brown

Leslie Brown
Senior Vice President / General Counsel / Secretary

2-26-16
Date

Atlantic Broadband (CT), LLC

Atlantic Broadband (Delmar), LLC

Atlantic Broadband (Miami), LLC

Atlantic Broadband Enterprise, LLC

Atlantic Broadband (Penn), LLC

Atlantic Broadband (SC), LLC

Atlantic Broadband Finance, LLC

Calendar Year 2015

Attachments: Exhibit A - Statement of CPNI Procedures and Compliance

Atlantic Broadband Customer Privacy Notice

Last revised: November 10, 2015

This Privacy Notice describes our practices with respect to your "personally identifiable information" and certain other information. Personally identifiable information is information that identifies a specific person. It does not include aggregate data that does not identify individual customers. The terms "Atlantic Broadband," "us," "we" or "our" refer to the Atlantic Broadband entity that provides service to you. This Privacy Notice applies to Atlantic Broadband customers and their use of Atlantic Broadband's cable TV, Internet and phone services. Use of Atlantic Broadband's website, any subdomains, and its various related features, is governed by Atlantic Broadband's Website and Mobile Application User Agreement and its Website Privacy Policy, both of which can be found at www.atlanticbb.com.

Atlantic Broadband considers the privacy of our customers to be very important. Section 631 of the Federal Cable Communications Policy Act of 1984, as amended (the "Cable Act"), provides certain protections to you, as a subscriber to cable service or other services provided by Atlantic Broadband. In accordance with the Cable Act, this Privacy Notice explains the following:

- the limitations imposed by the Cable Act upon Atlantic Broadband in its collection and disclosure of personally identifiable information about you;
- the type of personally identifiable information we collect about you;
- how we use your personally identifiable information;
- under what circumstances we may disclose your personally identifiable information and to whom we may disclose it;
- the duration for which we maintain your personally identifiable information; and
- how you may access your personally identifiable information in our possession.

Information We Collect

The Cable Act authorizes Atlantic Broadband to collect personally identifiable information about our customers (1) as necessary to render our cable service or other services to you, and (2) to detect unauthorized reception of cable communications. We collect customer information from several sources. We ask you to provide some data directly to us when you sign up for a service. We also collect information about your use of our products, services, and sites. In addition, we collect data from third party companies, and we may combine this third-party data with the data we have collected. Some of this information is personally identifiable, but much of it is not. We collect this information in order to provide and improve our products and services and better tailor them to meet our customers' needs, and to develop and offer new products and services. We maintain customer records that include personally identifiable information to enable us to better serve our customers. The types of information we collect are set forth below.

<u>What we collect</u>:

- *Registration information.* When you register with us or sign up for our products or services, we require you to provide to us information about yourself, including all or some of the following: your name, service and billing address, email address, telephone number, social security number, driver's license number, billing and credit records, bank account and credit card numbers used to pay for our services.
- *Account and technical information.* We maintain business records including some or all of the following: your account number, billing, payment and deposit history, services to which you subscribe, maintenance and complaint information, device identifiers and network addresses of

equipment used with your account, the number of television sets, set-top boxes, modems, telephones, routers and other devices connected to our cable system and other service-related information.

- *Communications with us.* When you contact us by email, chat or by telephone, we collect information, including your name, address, email address, telephone number, and billing or account information; we also retain customer correspondence and communication records.
- *Use of our services.* When you use our cable TV service, our equipment automatically collects information about your use of the services and features, including your use of set-top boxes, remote controls, electronic program guides, video players, applications, tablets and other devices and software connected to our cable system. This information includes which channels, programs and advertisements are viewed and for how long. General audience measurement data concerning viewing habits is anonymous or aggregated with other customer data and does not reflect names, addresses or other personally identifiable information. Personally identifiable information, such as account and billing information, will be collected for specific transactions, such as purchasing a pay-per-view program or other service.
- *Location data.* If you choose to enable location services on your device used to receive our services, we may collect your device's location for certain purposes. Location information is stored by us in an anonymous, aggregate way that does not identify you personally. The location information is used to identify which Atlantic Broadband system provides service to you, in order to provide relevant information related to our services in your area. If you do not want us to collect your device's location, you can disable location services on your device using the device settings.
- *Data from other sources.* We may collect additional data, including demographic and billing or credit history, from other sources. We use customer surveys, questionnaires, and interviews to gather information about your interests and use of our products and services.

How we collect data:

We may collect data using a number of different technologies. Some of this data you provide, such as when you sign up for our service, send us an email or use eCare to pay your bill. Some of this information we collect when you access our services, including from the equipment Atlantic Broadband provides to you as well as from equipment you may own that you use to access those services. For instance, if you subscribe to our cable TV service, our set-top boxes automatically collect information related to audience measurement. Similarly, if you watch TV online using your own computer, tablet, or smartphone, we may collect data about the type of browser or operating system you are using and your IP address.

How We Use Data

We collect, maintain and use personally identifiable information as permitted by the Cable Act and the Communications Act and other applicable laws. We use this information primarily to conduct business activities related to providing you with our cable service and other services and to help us detect theft of service. Below are specific ways in which we use personally identifiable customer information:

- to install, configure, operate, upgrade, support and maintain our cable service and other services;
- to provide billing, account maintenance, product and service repair and to provide customer service to you;
- to monitor and detect against fraud or abuse of our products and services and to protect against harm to us or our subscribers; we also use this data to determine whether there are violations of any applicable policies and terms of service;
- to provide you with accurate and high quality customer service, properly deliver your services and

protect the security of the system;

- to communicate with you, in response to your inquiries and customer service requests, to notify you about your account and subscription information, to inform you of software and security updates, and to create offers and contact you about other products or services that may be of interest to you; we may combine this data with third-party data to allow us to customize products and services to a particular geographic area;
- to manage the network supporting our services;
- to enhance and improve our offerings and their functionality, to provide you with personalized offers and features, and tailor our services to make them more useful and enjoyable for you;
- to personalize your settings on our products and services so that you don't have to change these settings each time you use them; and
- to measure Internet service performance, including network and connection performance, device configuration, and other service related data.

We may collect viewership information in order to customize and personalize television service offerings to make them of greater interest to you. We also use viewership information to determine which shows are most popular, how many people watch a program to its conclusion, and whether people are watching commercials. We may also provide information like subscriber lists or certain anonymous or aggregate information (that does not identify specific subscribers) to third parties working on our behalf, such as audience measurement or market research firms. This information may be combined with aggregated or non-aggregated demographic information (such as census data) and other audience attributes, such as purchasing data, demonstrated interests (such as a preference for sports programming), loyalty programs, organizational affiliations, advertiser customer lists and similar data to provide us with audience analysis data. Our third party partners may provide such de-identified, aggregate audience measurement data to others, including advertisers, so that they may better focus their advertising resources. We may also work with academic or research interest groups to analyze aggregate, anonymous information we provide to them for specific purposes or projects. We use this information and analysis to improve our cable TV service and other services and make programming and advertising more relevant to our subscribers. We may also use this information to distribute and deliver relevant programming and advertising to you without disclosing personally identifiable information about you to programmers or advertisers. We, or third parties working on our behalf, may combine demographic and other generally available information or advertiser information with our subscriber lists. Aggregate reports are then generated to reflect how groups of customers with common characteristics, such as age and gender or a demonstrated interest in a particular product, use our services and respond to the programming and advertising that we distribute. We may use this information to improve and communicate with you about our own products and services and also to help us deliver relevant information and advertising on behalf of other companies and advertisers to certain subscriber groups who may be most interested in this information and advertising. When we do this, we do not share your personally identifiable information with these advertisers, unless you provide your express consent. We may also combine personally identifiable information from our business records with personally identifiable information obtained from third parties to create a database, which we use in marketing and other activities related to our cable service and other services.

We use activity data associated with particular devices, such as set-top boxes, portable devices and other supported devices so that we know where to deliver the services and how to troubleshoot them. We may also use activity data to help us learn how popular certain programs are and how our customers as a whole generally prefer to view certain kinds of programming using cable video service, including whether they like to watch certain programs live, on demand, on mobile devices or online. This may require us to compare or combine activity data on our cable system with online activity data. We may also use activity data to determine whether promoting content and services in certain ways helps attract a larger audience

and more customers. We may provide reports on this data to programmers and other third parties, but we do not provide any personally identifiable information about our subscribers. We may compare or combine information, such as activity data, we receive when you use cable TV services to view content or advertising with information about your use of content and advertising that we deliver on other platforms, such as TiVo devices, websites and mobile applications. We do this to better understand how our customers access and use our products and services in all of the places that we offer them.

When you watch TV online on your computer, tablet or smartphone or use our applications, we use your email address and password to authenticate you as a subscriber to our service to enable you to view the content.

When you use our digital video recording service, our DVR partner collects information about you, including personal and viewership information, to provide that service. Our DVR partner may use aggregated and anonymous information about your use of its product for various purposes, including maintaining and improving its service and conducting audience research data.

We transmit, and may collect and store for a period of time, personally identifiable and non-personally identifiable information about you when you use our Internet and phone services to: send and receive e-mail, video mail and instant messages; transfer and share files; make files accessible; visit websites; place or receive calls; leave and receive voice mail messages; use the applicable communications center or voice center; establish custom settings or preferences; communicate with us for support; or otherwise use the services and their features.

We sometimes allow third-party service providers to transmit, collect and store this information on our behalf to provide features of our services. These third parties are not permitted to use your personally identifiable information except for the purpose of providing these features.

How We Share Data

Except as described in this Privacy Notice, we do not share your personal data without your consent. We may share or disclose your personal data in the following ways:

- as necessary to render or conduct a legitimate business activity related to the cable service or other services we provide to you, as described in this Privacy Notice;
- within the Atlantic Broadband family of companies, including with affiliates and subsidiaries or to others who work for us; we may also disclose personally identifiable information about you to outside auditors, professional advisors, service providers, vendors and regulators; or as part of a corporate transaction, such as a merger or sale of the business' assets;
- with vendors and partners that help us with various business purposes, such as offering, marketing, providing, billing for, and maintaining or repairing our network, products and services;
- with other outside companies to deliver targeted direct mail campaigns, as described in this Privacy Notice;
- with law enforcement agencies and other parties as required by law or to respond to lawful requests; these disclosures may be made with or without the subscriber's consent, and with or without notice, in compliance with the terms of legal process, such as subpoenas, court orders or search warrants.
- in order to protect against fraud, abuse, or harm or to protect our interests; and
- in order to protect our customers, employees, or property, in emergency situations, to enforce our rights under our terms or service and policies, in court or elsewhere, and as otherwise permitted by law.

The Cable Act authorizes Atlantic Broadband to disclose limited personally identifiable information to others for cable or non-cable "mailing list" or other purposes. Although we do not generally provide mailing lists to third parties, we may disclose your name and address for these purposes. However, you have the right to prohibit or limit this kind of disclosure by sending us a written request as described below. Any "mailing list" and related disclosures that we may make are limited by the Cable Act to disclosures of subscriber names and addresses where the disclosures do not reveal, directly or indirectly, (i) the extent of any viewing or other use by the subscriber of a cable service or other service provided by us; or (ii) the nature of any transaction made by the subscriber over the cable system.

In connection with phone service, such as Caller ID, 911/E911, and directory services, we may disclose your information as follows:

- We may transmit your name and/or telephone number to be displayed on a Caller ID device unless you have elected to block such information. Please note that Caller ID blocking may not prevent the display of your name and/or telephone number when you dial certain business or emergency numbers, 911, 900 numbers, or toll-free 800, 888, 877, 866 or 855 numbers.
- We may provide your name, address and telephone number to public safety authorities and their vendors for inclusion in E911 databases and records, inclusion in "reverse 911" systems, or to troubleshoot 911/E911 record errors.
- We may publish and distribute, or cause to be published and distributed, telephone directories in print or on the Internet. Those telephone directories may include subscriber names, addresses and telephone numbers, without restriction to their use.
- We may also make subscriber names, addresses and telephone numbers available, or cause such subscriber information to be made available, through directory assistance operators.
- We may provide subscribers' names, addresses and telephone numbers to unaffiliated directory publishers and directory assistance providers for their use in creating directories and offering directory assistance services.

We take reasonable precautions to ensure that non-published and unlisted numbers are not included in telephone directories or directory assistance services, but we cannot guarantee that errors will never occur.

How We Protect Your Data

We follow industry-standard practices to take such actions as are necessary to prevent unauthorized access to personally identifiable information. However, we cannot guarantee that these practices will prevent every unauthorized attempt to access, use or disclose personally identifiable information.

Protecting Children's Privacy

Our websites, products, and services are not directed to children under 13. We do not knowingly collect personally identifiable information about children under 18, unless expressly specified.

Third Party Services

Our websites, products, or services may contain links to or permit you to access other websites and services that are not offered or maintained by Atlantic Broadband. The privacy policies of those sites and services apply to your access and use of those websites and services and to the information they collect about you. We encourage you to be aware when you leave our service, or surf the Internet, and to read the privacy statements of the websites and services that you visit.

How Long We Retain Personally Identifiable Information

Atlantic Broadband maintains personally identifiable information about you in our regular business records while you are a subscriber to our cable service or other services. We also maintain this information for a period of time after you are no longer a subscriber if the information is necessary for the purposes for which it was collected or to satisfy legal requirements. These purposes typically include business, legal or tax purposes.

Accessing Personal Information

You may see the information that we collect about you. You can access and update some of the personal information we collect about you through your account with us by logging in to your account with your username and password. You may also schedule an appointment at your local business office to see your personally identifiable information. Please send us a written request at the address below or to the business office address listed on your monthly bill, and we will make an appointment for you to come in during our regular business hours. Subscribers to our phone services should be aware that we generally do not provide them with records of any inbound or outbound calls or other records that we don't maintain in the ordinary course of business or which are available only from our archives, without valid legal process such as a court order. If your review reveals an error in our records, we will correct it, to the extent within our control (for example, we cannot control information in telephone directories).

CPNI

Section 222 of the Communications Act of 1934, as amended (the "Communications Act"), and the related Federal Communications Commission ("FCC") rules provide additional protections to customers of our services classified as a "telecommunications service." These rules protect "Customer Proprietary Network Information" or CPNI, which includes information relating to the (1) quantity, technical configuration, type, destination, location and amount of your use of telecommunications services, and (2) information contained on your bill concerning the telecommunications services that you receive. CPNI is subject to special protections. Examples of CPNI include information typically available from details on a customer's monthly phone and/or broadband bill—the type of line, technical characteristics, class of service, current phone charges, long distance and local service billing records, directory assistance charges, usage data and calling patterns. CPNI does not include your name, address, and phone number standing alone. As a subscriber to our telecommunications services, you have the right, and Atlantic Broadband has a duty, under federal law, to protect the confidentiality of CPNI. The Communications Act permits Atlantic Broadband to use, disclose, and permit access to CPNI obtained from our customers pursuant to 47 U.S.C.A. § 222(d).

Atlantic Broadband offers many communications-related services. From time to time we would like to use the CPNI information we have on file to provide you with information about our communications-related products and services or special promotions. Our use of your CPNI may also enhance our ability to offer products and services tailored to your specific needs. We would like your approval so that we, our agents and affiliates may use your CPNI to let you know about Atlantic Broadband's communications-related services other than those to which you currently subscribe that we believe may be of interest to you. You have the right to restrict this use of CPNI. IF WE DO NOT HEAR FROM YOU WITHIN 30 DAYS OF THIS NOTIFICATION, WE WILL ASSUME THAT YOU APPROVE OUR USE OF YOUR CPNI FOR THE PURPOSES OF PROVIDING YOU WITH INFORMATION ABOUT OTHER COMMUNICATIONS-RELATED SERVICES. YOU MAY DENY OR WITHDRAW OUR RIGHT TO USE YOUR CPNI AT ANY TIME BY WRITING TO THE ADDRESS BELOW. (We will also honor

any restrictions applied by state law, to the extent applicable.)

Atlantic Broadband also offers various other services that are not related to the telecommunications services to which you subscribe. Under CPNI rules, some of those services, such as Atlantic Broadband Cable TV services, are considered to be non-communications related services. Occasionally, you may be asked during a phone call with one of our representatives for your oral consent to Atlantic Broadband's use of your CPNI for the purpose of providing you with an offer for these non-communications products or services. If you provide your oral consent for Atlantic Broadband to do so, Atlantic Broadband may use your CPNI for the duration of such phone call in order to offer you additional services.

Pursuant to an order of the FCC, our broadband service is now classified as a "telecommunications service." Certain information relating to your use of our broadband service will be considered CPNI and subject to additional privacy protections and use restrictions. In the absence of specific guidance from the FCC, we will take reasonable, good faith steps to protect the CPNI of our broadband service customers in accordance with the requirements of the Communications Act, as applicable, and as described in this Privacy Notice.

Any action that you take to deny or restrict approval to use your CPNI will not affect our provision to you, now or in the future, of any service to which you subscribe. You may disregard this notice if you previously contacted us in response to a CPNI Notification and denied use of your CPNI for the purposes described above. Any denial of approval for use of your CPNI outside of the service to which you already subscribe is valid until such time as your phone or broadband services are discontinued or you affirmatively revoke or limit such approval or denial.

Communication Preferences/Opt Out

You may opt out of receiving marketing communications from Atlantic Broadband at any time. To opt out of marketing communications sent by email, you may use the "unsubscribe" link at the bottom of any such email, or you may send your request in writing. You may also prohibit our permitted disclosure of your information to third parties under the Cable Act (except as otherwise required by legal process or applicable law) by notifying us in writing. Such requests should be sent to the following address:

Atlantic Broadband
ATTN: Customer Privacy Specialist
Two Batterymarch Park, Suite 205
Quincy, MA 02169

You may opt out of receiving marketing communications by telephone by notifying the calling party that you wish to opt out or by following the automatic opt-out instructions on such a call. You may also opt out of such calls by sending a request in writing to the address above.

What E-Mail Communications Will Atlantic Broadband Send Me?

We may send a welcome e-mail and sometimes other information to new subscribers to our cable service and other services. We may also send service-related announcements to our subscribers from time to time. We may send you an e-mail announcement of pricing changes, changes in operating policies, a service appointment or new features of one or more of the cable service or other services you receive from us. You may not opt out of these service-related communications. If you fail to check your primary e-mail address, you may miss important information about our services, including legal notices. We reserve

the right to send you promotional or commercial e-mail as permitted by applicable law. You can manage the promotional or commercial e-mails we may send to you by following the instructions contained in the e-mails.

Changes to Privacy Notice

We may update this Privacy Notice from time to time. We will notify you of any changes by posting the updated Privacy Notice online, and if we make a material change in how we treat your personal information, we will take reasonable steps to notify you in advance of the planned change. If you object to a change, you may cancel your service. If you continue to use the service following notice of the changes, we will deem that to be your acceptance of and consent to the changes in the revised privacy notice. This includes your consent for any personally identifiable information that we may collect and use starting on the effective date of the revised notice, as well as for any personally identifiable information that we have collected prior to the effective date of the revised notice. We will provide you with a copy of the current Privacy Notice at the time you subscribe to our service, and each year that you continue to be a subscriber.