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February 29, 2016

By ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: OV LLC d/b/a Optimum Voice, NY OV LLC, WIFI NY LLC, and WIFI CT-NJ LLC; Annual Customer Proprietary Network Information Certification, EB Docket No. 06-36
Redacted for Public Inspection

Dear Ms. Dortch:

On behalf of OV LLC d/b/a Optimum Voice, NY OV LLC, WIFI NY LLC, and WIFI CT-NJ LLC (collectively "OV LLC") and pursuant to 47 C.F.R. § 64.2009(e), attached please find a redacted version of OV LLC's 2016 Annual Customer Proprietary Network Information compliance certification ("CPNI Certification") covering calendar year 2015.

The confidential version of the filing is being submitted concurrently, by hand delivery, under separate cover.

Please contact the undersigned at (202) 342-8614 if you have any questions regarding this filing.

Respectfully submitted,

Steven A. Augustino
Denise N. Smith

Counsel to OV LLC d/b/a Optimum Voice, NY OV LLC, WIFI NY LLC, and WIFI CT-NJ LLC

REDACTED FOR PUBLIC INSPECTION

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB DOCKET 06-36

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

Name of Companies:	OV LLC d/b/a Optimum Voice NY OV LLC WIFI NY LLC WIFI CT-NJ LLC	
Form 499 Filer IDs:	OV LLC d/b/a Optimum Voice: NY OV LLC: WIFI NY LLC: WIFI CT-NJ LLC:	828325 828137 830789 831372
Name of Signatory:	Kristin Dolan	
Title of Signatory:	Chief Operating Officer	

I, Kristin Dolan, certify that I am an officer of the companies named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operational policies that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's policies ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. *See* 47 C.F.R. § 64.2009(e).

The Company has not taken any actions (*i.e.* proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers during the above-referenced certification period. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company' operational policies for compliance with the Commission's CPNI rules.

[BEGIN REDACTION]

[END REDACTION]

Dated: _____

Signed: _____
Kristin Dolan
Chief Operating Officer
OV LLC
NY OV LLC
WIFI NY LLC
WIFI CT-NJ LLC

REDACTED FOR PUBLIC INSPECTION

STATEMENT PURSUANT TO 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

OV LLC and NY OV LLC (jointly, "OV LLC") and WIFI NY LLC and WIFI CT-NJ LLC (jointly, "WIFI LLC") (collectively, the "Company") are committed to protecting the privacy of its customers' confidential and proprietary information and has established operational policies to protect CPNI. The following statement explains the operational policies of the Company to ensure that it is in compliance with the CPNI rules of the Federal Communications Commission ("Commission" or "FCC").

Use of CPNI

1. The Company uses CPNI for the purpose of providing a customer with the requested service. The Company also uses CPNI for various purposes permitted by law. For example, the Company may use, disclose or permit access to CPNI:

a. to initiate, render, bill, and collect for telecommunications services and its Voice-over-Internet Protocol ("VoIP") services;
b. to protect the rights or property of the Company, or to protect users of those services and other services providers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
c. to provide inbound telemarketing, referral, or administrative services to the customers for the duration of the call, if such call is initiated by the customer and the customer approves of the use of such CPNI to provide such service;
d. for purpose of providing customer premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion;
e. for the provision of inside wiring, installation, maintenance, repair services;
f. to market services within the categories of service to which the customer already subscribes;
g. to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provider directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

2. The Company does not use, disclose, or permit access to CPNI to market service offerings that are within a category of service to which the customer does not already subscribe from Cablevision, unless the Company obtains proper customer approval in accordance with Commission rules and regulations. The Company does not use CPNI to identify or track customers that call competing service providers.

Protection of CPNI

3. The Company does not provide Call Detail Record ("CDR") information over the telephone to customers who contact the Company. However, if a customer properly identifies a call, the Company may assist the customer with regard to that particular call and will not release any other CDR information. The Company provides non-CDR information over the telephone to customers who are properly verified by the Company.

4. The Company does not provide access to CPNI online unless the customer provides a valid password. In order to establish the Optimum Voice password, the customer must either be connected to the internet via the company's cable modem, or provide the MAC address of their cable modem during the registration process. If a customer forgets the password, the customer may contact the Company's Customer Service. Customer Service will authenticate the customer without reliance on readily available biographical information or account information and reset the password.

5. The Company will provide certain OV LLC CPNI information at retail locations provided the customer can provide a valid government-issued photo identification matching the customer's account information.

Law Enforcement and Required Disclosures

6. The Company notifies customers of certain account changes, including whenever a customer's password or response to a security question means of authentication, or electronic Address of Record is created or changed. However, notification will not be sent when a customer initiates service. The notification is sent by electronic mail to the Address of Record or by mail to the Address of Record, as to reasonably ensure that the customer receives the notification. The notification does not provide the updated information.

7. The Company must disclose CDR CPNI upon affirmative written request by a customer to any person designated by the customer. The customer's written request will be verified by the Company. All written subscriber requests for CDR CPNI are processed by the Company's Shared Services Department. All valid subpoenas or other legal process for CDR CPNI are processed by the Company's Subpoena Compliance Department.

8. Within 7 days of a reasonable determination of breach (*i.e.*, when a third party intentionally gains access to, used or disclosed CPNI without customer authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni.

- After 7 days of USSS and FBI notice, if the Company has not received written direction from the USSS or FBI, the Company will notify the customer of the breach, unless the USSS and FBI have extended the period for such notice.

- For 2 years following USS and FBI notice, the Company will maintain a record of: (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

- If there is a possibility of immediate and irreparable harm, Cablevision may notify the customer immediately after consultation with law enforcement.

Training, Recordkeeping and Enforcement

9. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

10. In the event that the Company uses CPNI for sales or marketing campaigns, the Company will maintain a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is

required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least 1 year following the sales and marketing campaign.

11. The Company maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of 1 year following the supervisory review.

12. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.