



Davis Wright
Tremaine LLP

Suite 800
1919 Pennsylvania Avenue NW
Washington, DC 20006-3401

James M. Smith
202.973.4288 tel
202.973.4499 fax

jamesmsmith@dwt.com

March 1, 2016

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Antietam Cable Television, Inc., we are submitting herewith its **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for Calendar Year 2015** in the above-referenced proceeding.

Kindly address any questions concerning this submittal to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP

A handwritten signature in black ink, appearing to read 'James M. Smith', written over the typed name.

James M. Smith
Counsel for Antietam Cable Television, Inc.

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

EB Docket 06-36

Annual 47 CFR §64.2009(e) CPNI Certification for 2016 covering the prior calendar year (2015)

Date filed: March 1, 2016

Name of company covered by this certification: Antietam Cable Television, Inc.

Form 499 Filer ID: 826759

Name of signatory: Brian Lynch

Title of signatory: President

I, Brian Lynch, 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 requirements Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

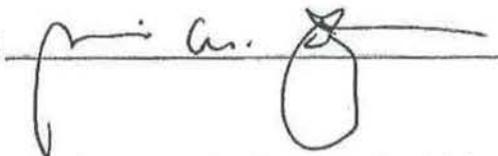
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any 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 in the past year.

The company has not received any 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.

Signed



Attachment: Accompanying Statement Explaining CPNI Procedures

**ANTIETAM CABLE TELEVISION, INC.
STATEMENT OF CPNI OPERATING PROCEDURES**

Antietam Cable Television, Inc.'s ("Company") written CPNI Operating Procedures ensure that Company will be in compliance with 47 U.S.C. § 222 and the rules contained in Title 47 of the Code of Federal Regulations (47 C.F.R. § 64.2001 *et seq.*). Included among the provisions of Company's CPNI Operating Procedures are:

- A requirement that Company have at all times a CPNI Compliance Supervisor to supervise the implementation of Company's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI in compliance with FCC rules.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers, where required.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns, and maintenance of a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A supervisory review process regarding compliance with its CPNI policy, and a written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC's rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni> and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule. The Company will maintain a record of any such breaches and notifications for at least two (2) years.