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March 1, 2016

BY ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Filing of Customer Proprietary Network Information (CPNI) Compliance Certification, EB Docket No. 06-36*

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), Windstream hereby files its 2015 annual certification of compliance with the Commission's customer proprietary network information (CPNI) rules. As discussed therein, this certification pertains to the Windstream Services, LLC¹ subsidiaries listed in Attachment A, Appendix 1 to the certification.

Please call me at (501) 748-5777 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward B. Krachmer", written over a horizontal line.

Edward B. Krachmer

Attachment

cc: Best Copy and Printing, Inc. (by e-mail)

¹ Prior to February 28, 2015, Windstream Services, LLC was known as Windstream Corporation.

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2015**

Date Filed: March 1, 2016

Name of Company(s) Covered by this Certification: **Windstream Services, LLC's subsidiaries.¹ Please see Attachment A, Appendix 1 for a list of the companies covered by this certification.**

Form 499 Filer ID: **Please see Attachment A, Appendix 1 for a list of the Form 499 Filer IDs assigned to each company.**

Name of Signatory: John P. Fletcher

Title of Signatory: Executive Vice President & General Counsel

I, John P. Fletcher, certify that I am an officer of the companies named above, and acting as an agent of those companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attachment A to this certification is a statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what step companies are taking to protect CPNI.

In 2015, the companies received no customer complaints 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 be subject to enforcement action.

Signed: _____



¹ Prior to February 28, 2015, Windstream Services, LLC was known as Windstream Corporation.

ATTACHMENT A

WINDSTREAM SERVICES, LLC SUBSIDIARIES STATEMENT OF CPNI COMPLIANCE PROCEDURES

Windstream Services, LLC² and its pertinent subsidiaries³ (collectively “Windstream”) has a policy of providing regular CPNI notices to all customers and obtains approval from all customers to use CPNI for marketing purposes. Windstream also provides existing customers with the ability to change or rescind their consent to the company’s use of their CPNI at any time. Windstream’s CPNI notices explain the customers’ CPNI rights in accordance with the FCC’s CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from Windstream that is based upon Windstream’s use of their CPNI. From time to time, Windstream may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. Windstream maintains records of customer approval and the delivery of its CPNI notices for at least one year.

Windstream has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use or disclosure of that customer’s CPNI unless, as discussed below, a one-time approval of CPNI is obtained, Windstream representatives who market using CPNI, review this status and refrain from marketing to customers with a CPNI restricted account.

In accordance with the CPNI rules, upon obtaining a customer’s oral authorization, customer service representatives of Windstream may access a customer’s CPNI during the course of an inbound or outbound telephone conversation. Each such Windstream representative must provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

Windstream may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Windstream, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

Windstream does not sell or lease CPNI to any third parties. Windstream only shares CPNI with third parties consistent with federal and state law and regulation.

² Prior to February 28, 2015, Windstream Services, LLC was known as Windstream Corporation.

³ Pertinent subsidiaries are described in Appendix 1 to this Statement.

Windstream maintains a record for at least one year of its own and affiliates' sales and marketing campaigns that use customers' CPNI. Windstream has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. Further, Windstream has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations.

All Windstream employees who have access to CPNI receive training about CPNI compliance. Specifically, all new customer service employees are provided with CPNI training. Moreover, Windstream's confidentiality policies are included in training that all employees receive and are required to acknowledge in writing. All Windstream employees are required to maintain the confidentiality of CPNI consistent with federal and state law and regulation. Employees who do not abide by these policies or otherwise improperly permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

Windstream has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly, as required by FCC rules.

Windstream has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Windstream will notify affected customers after waiting the requisite timeframe. Windstream will maintain a record of any CPNI-related breaches for a period of at least two years.

Windstream has implemented procedures whereby it will not provide CPNI without proper customer authentication. Windstream uses a variety of methods to authenticate a customer's identity prior to disclosing CPNI. These methods vary depending on the type of CPNI to be disclosed and are consistent with FCC rules. In addition, Windstream has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that is also consistent with FCC rules. Windstream has implemented procedures to inform the primary contact of any change of address, e-mail or if additional customer employees are seeking access to account information in a manner that conforms with the relevant rules.

APPENDIX 1

WINDSTREAM SERVICES, LLC SUBSIDIARIES SUBJECT TO ITS STATEMENT OF CPNI COMPLIANCE PROCEDURES

Windstream Services, LLC's Statement of CPNI Compliance Procedures apply to subsidiaries associated with the following FCC Form 499 Filer IDs:

Form 499

<u>Filer ID</u>	<u>Form 499 Filer ID Name</u>
801606	Windstream Montezuma, Inc.
801714	Windstream Lexcom Communications, Inc.
801717	Windstream Lexcom Long Distance, LLC
802014	Windstream NTI, Inc.
802035	Windstream Systems of the Midwest, Inc.
802036	Windstream of the Midwest, Inc.
802434	Windstream Nebraska, Inc.
802491	Windstream Norlight, Inc.
802581	Windstream Conestoga, Inc.
804615	Windstream Accucomm Telecom, LLC
804681	Windstream D&E, Inc.
804682	D&E Networks, Inc.
805033	Oklahoma Windstream, LLC
805035	Windstream Alabama, LLC
805044	Windstream Missouri, Inc.
805059	Windstream South Carolina, LLC
805062	Windstream Georgia, LLC
805074	Windstream New York, Inc.
805077	Windstream Sugar Land, Inc.
805080	Windstream Florida, Inc.
805083	Windstream Arkansas, LLC
805086	Windstream Ohio, Inc.
805089	Windstream North Carolina, LLC
805092	Windstream Pennsylvania, LLC.
805095	Windstream Western Reserve, Inc.
805102	Windstream Georgia Communications, LLC
805105	Georgia Windstream, LLC.
805122	Windstream Mississippi, LLC.
805134	Windstream Oklahoma, LLC
805140	Texas Windstream, Inc.
805149	Windstream Kentucky West, LLC
806927	Carolina Personal Communications, Inc.
807705	Windstream Communications Kerrville, LLC
808110	Windstream Buffalo Valley, Inc.
808203	Windstream Georgia Telephone, LLC
808239	Windstream Lakedale, Inc.

Form 499

<u>Filer ID</u>	<u>Form 499 Filer ID Name</u>
808240	Windstream Lakedale Link, Inc.
808467	Windstream Concord Telephone Company
809320	Windstream Standard, LLC
	McLeodUSA Telecommunications Services, Inc.
809572	Infocore, Inc.
809692	Windstream Kerrville Long Distance, LLC
812933	Windstream KDL, Inc.
815924	PaeTec Communications, Inc.
818024	Windstream Direct, LLC
819728	Valor Telecommunications of Texas, LP
820011	Windstream EN-TEL, LLC
820087	Windstream D&E Systems, Inc.
820376	Cavalier Telephone, LLC
820454	Windstream Iowa Communications, Inc.
820463	Windstream Communications Telecom, LLC
821094	Intellifiber Networks, Inc.
821372	Windstream Iowa-Comm, Inc.
821560	Windstream Lexcom Wireless, LLC.
821876	Windstream Southwest Long Distance, LP
821878	Windstream Kentucky East, LLC
822508	Talk America, Inc. - CONSOLIDATED
822848	US LEC Corp. - CONSOLIDATED
823964	Windstream NuVox, Inc.
825434	Windstream-IT-Comm, LLC
825534	Windstream Communications, Inc.
825732	Lakedale Communications, LLC
825765	US LEC iTel, LLC
825929	Windstream Lexcom Entertainment, LLC
826491	Windstream NorthStar, LLC
827845	