



March 1, 2016  
Via ECFS Filing

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

RE: Conterra Ultra Broadband, LLC  
EB Docket No. 06-36; CY2015

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 Conterra Ultra Broadband, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@tminc.com](mailto:cwrightman@tminc.com).

Thank you for your assistance in this matter.

Sincerely,

/s/ Connie Wightman  
Consultant

cc: Tanya Gardner - Conterra Ultra Broadband, LLC - Via Email  
file: Conterra Ultra Broadband, LLC - FCC  
tms: FCCx1601

Enclosures  
CW/lw



## **Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC Statement Regarding Customer Proprietary Network Information (CPNI) Operating Procedures**

Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (collectively "Conterra"), in accordance with section 64.2009(e), submit this statement summarizing how Conterra's operating procedures are designed to ensure compliance with the Commission's CPNI rules. Each company provides exclusively broadband (backhaul) services to schools and libraries and other carriers. This statement summarizes the procedures that each company has implemented to safeguard the CPNI of its respective customers.

Conterra values its customers' privacy, and takes measures to ensure that it protects CPNI. It is Conterra's policy to protect the confidentiality of its customers' information. Conterra does not use, disclose, or permit access to its customers' CPNI except as such use, disclosure, or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commission's implementing rules.

As necessary, Conterra may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. The company also may use CPNI to protect its rights or property.

Conterra has a process in place for verifying its customers' identity during an in-bound call. Conterra does not release call detail information during an in-bound call.

Conterra trains its personnel in the use of CPNI. Conterra has an express disciplinary process in place for violation of the company's CPNI policies.

Conterra does not use CPNI to market products and services to customers outside of the category of service to which the customer already subscribes. Conterra also does not share CPNI with its affiliates or third parties for marketing purposes. If, in the future, Conterra seeks to use CPNI for these purposes, then it will provide the appropriate notice to customers and will maintain a list of customer preferences. Conterra also will maintain a record of any marketing campaign in accordance with the Commission's rules.

Conterra takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Conterra has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach that result in the unauthorized access to, use, or disclosure of CPNI. Conterra will maintain a record of the notification in accordance with the Commission's rules.

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publically available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are described throughout this document.

Conterra has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.