



February 6, 2006

VIA ELECTRONIC FILING

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

**Re: Citynet, LLC
Citynet Holdings, LLC
Citynet Fiber Network, LLC
Certification of CPNI Filing
EB-06-TC-060, WC Docket No. 06-36**

Dear Ms. Dortch:

Citynet, LLC on behalf of its subsidiaries Citynet Holdings, LLC and Citynet Fiber Network, LLC and their affiliates (*i.e.*, Citynet West Virginia, LLC, Citynet Pennsylvania, LLC, Citynet Ohio, LLC, Citynet Indiana, LLC, Citynet Arizona, LLC, Citynet Columbus, LLC, Citynet Illinois, LLC, Citynet Virginia, LLC and Citynet Kentucky, LLC) (collectively "Citynet"), pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission's rules requiring that all telecommunications carriers protect the privacy of customer proprietary network information ("CPNI"),² submit this Certificate and accompanying Statement. Citynet takes seriously its responsibility to assure the confidentiality of its customers' CPNI. Citynet is cognizant of the media reports regarding release of subscriber information and assures the Commission that it protects such information and does allow it to be released to unrelated third parties for any reason. Citynet has implemented extensive operational procedures to protect the confidentiality of such information, consistent with the Commission's rules. Citynet strictly prohibits its employees from disclosing customer information to third parties outside the company. Nonetheless, in light of the media reports, Citynet is reviewing those

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2000, *et seq.*

February 6, 2006

Page 2

procedures and is currently implementing a more comprehensive program for protecting its customers' confidential information to expand its protections against inadvertent external release and to assure complete compliance as to its own internal uses of the information. As part of this comprehensive plan, Citynet will issue updated notices to its customers providing them additional opportunities to grant or deny Citynet approval to use their CPNI.

As requested by the Public Notice, the undersigned, as an officer of Citynet, certifies based upon personal knowledge that the following Compliance Statement accurately describes the operational procedures and policies implemented by Citynet to ensure the privacy of its customers' CPNI consistent with Commission's CPNI rules.

About Citynet

Citynet Holdings, LLC and its affiliates make up an integrated telecommunications provider offering retail local, long distance and Internet services in selected markets in Ohio, Pennsylvania, West Virginia and Indiana. Citynet Fiber Network, LLC is a facilities-based provider of wholesale long haul transport services across 17 states. Citynet Fiber Network serves only other telecommunications carriers and, to the extent it uses CPNI for marketing, only uses the same to market services of the type to which the customer already subscribes.

No Third Party Disclosure of CPNI

Because Citynet takes seriously its obligation to protect against disclosure of CPNI, Citynet does not disclose or otherwise provide access to CPNI to third parties.

No Use of CPNI For Marketing Non-Communications-Related Services

Citynet does not use CPNI for marketing Non-Communications related services to its customers.

Review Process for Outbound Marketing Campaigns

All **large scale** outbound marketing campaigns fall under the supervisory purview of Citynet's Senior Vice President – Marketing and are subject to review by Citynet's legal department to ensure that all applicable laws and regulations are observed.

Employment at Citynet is Contingent on Protecting Customer Confidential Information

Maintaining the privacy of Customers' CPNI is a condition of employment at Citynet. All employees are obligated to abide by the Citynet Customer Information Privacy Policy. This privacy policy, among other things, requires employees to hold customer confidential information in the strictest confidentiality and prohibits disclosure of customer specific information to third parties. Violations of this policy are subject to specific and appropriate disciplinary measures.

Customer Notice of Privacy Policy

February 6, 2006

Page 3

Citynet maintains a privacy policy which is located at <http://www.citynet.net/privacy.cfm>. Citynet currently is reviewing and revising all of its privacy policies for the continued protection of its customers confidential information.

Recordkeeping

Citynet maintains records of its outbound marking efforts in its customer record database. All customer service personnel, account managers and other sales personnel are required to record in the Citynet database their contacts with Citynet customers. These records are stored for at least one year.

In light of the recent troubling news reports regarding release of CPNI to third parties, Citynet is currently auditing the privacy protections currently in place. Concurrently with this audit, Citynet is establishing more comprehensive CPNI protections. To that end, and given the recent publicity about CPNI disclosure, Citynet is giving all of its customers additional opportunities to grant or deny Citynet approval to use CPNI for marketing communications related-services. Citynet will continue to maintain and enforce its prohibition on releasing customer confidential information to third parties and further CPNI approvals will not seek approval for release of CPNI to third parties that are not agents, independent contractors, or joint venture partners of Citynet.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J.A. Ray', with a stylized flourish at the end.

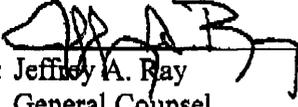
Jeffrey A. Ray
General Counsel

February 6, 2006

Page 4

Certificate

I, Jeffrey A. Ray, state that I am General Counsel for Citynet; that I am authorized to submit the foregoing Certificate and Compliance Statement on behalf of Citynet; and that it is true and correct to the best of my knowledge, information, and belief.


Name: Jeffrey A. Ray
Title: General Counsel
Citynet, LLC