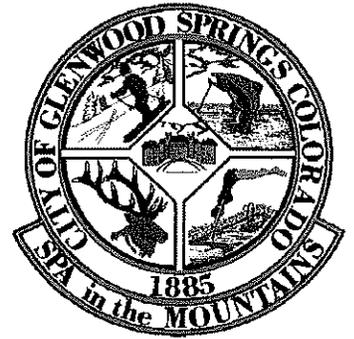


CITY OF GLENWOOD SPRINGS

OFFICE OF THE CITY MANAGER
101 WEST 8TH STREET
GLENWOOD SPRINGS, COLORADO 81601
PHONE: (970) 384-6408 FAX: (970) 384-6599



February 15, 2012

Via ECFS Electronic Filing

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

RE: 2011 Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), enclosed for filing with the Federal Communications Commission ("Commission") is the Customer Propriety Network Information ("CPNI") compliance certificate of the City of Glenwood Springs, Community Broadband Network ("Company") as well as the Company's statement of compliance with the Commission's CPNI rules.

If you have any questions concerning this matter, please contact me via email at noc@gscbn.com.

Respectfully,

Jeff Hecksel
City Manager

Enclosures

cc: Best Copy and Printing, Inc.
FCC@BCPIWEB.COM

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

EB Docket 06-36

Annual 64.2009(e) CPNI for 2011

Date filed: February 14, 2012

Name of Company covered by this certification: The City of Glenwood Springs, Community Broadband Network

For 499 Filer ID: 827610

Name of signatory: Jeff Hecksel

Title of signatory: City Manager

I, Jeff Hecksel, certify that I am the City Manager of the City of Glenwood Springs, a Colorado home rule municipality, and acting on behalf of the City, that I have personal knowledge that the City has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the City's procedures ensure that the City is in compliance with the requirements set forth in the Commission's rules.

The City has 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.

The City has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____

Jeff Hecksel
Jeff Hecksel, City Manager
City of Glenwood Springs
101 West 8th Street
Glenwood Springs, CO 81601
(970) 384-6400

Dated: February 14, 2012

STATEMENT OF THE CITY OF GLENWOOD SPRINGS, COMMUNITY BROADBAND NETWORK REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS GOVERNING THE USE AND PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

The City of Glenwood Springs, Community Broadband Network ("City") has implemented a number of processes and procedures to protect sensitive customer information and to help ensure that CPNI is used and maintained consistent with the rules of the Federal Communications Commission ("Commission").

All City employees working for The Community Broadband Network are required as a general matter to maintain the confidentiality of all customer-related information they obtain in connection with their employment. Moreover, the City implemented a CPNI protection policy to reflect the Commission's CPNI rules. The policy was delivered to all City employees that come in contact with customer-related information, and explains what constitutes CPNI, what requirements apply to use and/or disclosure of CPNI, what type of authentication is required to validate inbound requests for CPNI, and what kind of record keeping and reporting obligations apply to CPNI. The City's policy expressly provides that employees who fail to abide by the policy are subject to disciplinary action.

Consistent with the Commission's rules, the City uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protect the City's rights and property from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

At this time, the City does not use, disclose, or permit access to CPNI to make customers aware of any service offerings other than those within the same category of services to which the customer already subscribes. Further, the City does not at this time share, sell, lease, or otherwise provide any CPNI with or to any unaffiliated third parties for marketing purposes, and it will not do so in the future absent affirmative consent from the affected customers.

The City has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain City employees are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (e.g., take an order or resolve a billing question), and those employees that are authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI.

Through its policy, the City has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of CPNI and the time frames for such required by the Commission's rules.