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February 16, 2012

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

**Re: EB Docket No. 06-36 Annual Compliance Certification of Level 3
Communications, LLC and its Affiliates Pursuant to 47 C.F.R. § 64.2009(e): 2011**

Dear Ms. Dortch:

On behalf of Level 3 Communications, LLC and its Affiliates, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2011 CPNI compliance certification.

Please direct any questions regarding this submission to the undersigned.

Sincerely,

/s/ electronically signed

Erin Boone

Enclosure

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

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 16, 2012

Name of companies covered by this certification:

Level 3 Communications, LLC
Broadwing Communications, LLC
TelCove of Pennsylvania, LLC
TelCove Operations, LLC
Vyvx, LLC
Wiltel Communications, LLC
Global Crossing Telecommunications, Inc:
Global Crossing Bandwidth, Inc.
Global Crossing Local Services, Inc.
Global Crossing Americas Solutions, Inc. f/k/a Impsat-UAS Inc.
Global Crossing Telemanagement Virginia, LLC

Form 499 Filer ID:

Level 3 Communications, LLC: 818086
Broadwing Communications, LLC: 822866
TelCove of Pennsylvania, LLC: 811223
TelCove Operations, LLC: 820155
Vyvx, LLC: 824554
Wiltel Communications, LLC: 805503
Global Crossing Telecommunications, Inc: 803667
Global Crossing Bandwidth, Inc.: 809586
Global Crossing Local Services, Inc.: 805772
Global Crossing Americas Solutions, Inc. f/k/a Impsat-UAS Inc.: 811776
Global Crossing Telemanagement Virginia, LLC: 805772

Name of signatory: Michael Mooney

Title of signatory: General Counsel, Regulatory Policy

I, Michael Mooney, certify that I am an officer of the companies named above ("Level 3"), and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how Level 3's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Level 3 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

Level 3 has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Level 3 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. Level 3 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:



Michael Mooney

**STATEMENT OF LEVEL 3
REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS
GOVERNING USE AND PROTECTION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”)**

Level 3 has implemented a number of operating 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 (the “Commission”).

All employees of Level 3 are required as a general matter to maintain the confidentiality of all information they obtain in connection with their employment, including customer-related information. Level 3 has implemented a CPNI protection policy to reflect modifications to the Commission’s CPNI rules as adopted in April 2007. The policy explains, among other things, 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 kinds of record-keeping and reporting obligations apply to CPNI. The policy is also provided to new hires as part of their orientation materials. Level 3’s policy expressly specifies that those employees who fail to abide by the policy are subject to disciplinary action. In addition, Level 3 has and continues to engage in targeted training exercises and discussion sessions with those business units within the company that have access to CPNI for various business purposes to communicate the proper use and maintenance of CPNI. Finally, Level 3 has prepared and posted a video training program on its Intranet for training of new hires and viewing by employees who have questions regarding CPNI-related matters, and has established and communicated to employees dedicated contact information for questions regarding such matters.

Consistent with the Commission’s rules, Level 3 uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of Level 3, other users, and other carriers 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, Level 3 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 service to which the customer already subscribes. Further, Level 3 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 customer(s). Any outbound requests for approval from customers with respect to use of CPNI in such marketing campaigns are to be reviewed in advance by the Level 3 legal department and appropriate supervisory personnel. Level 3 maintains records relating to such marketing campaigns that use CPNI for at least one year.

Level 3 has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain organizations within the company are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (*e.g.*, to take an order, resolve a billing question, or resolve a service trouble report). In turn, those

organizations 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. With respect to customer requests regarding call detail information, all employees have been instructed to refer such requests to a specific organization within Level 3 that has been trained not to provide such information to inbound callers over the phone, and instead transmits such information in a manner consistent with the Commission's rules (*i.e.*, by either sending information to the account postal or email address of record or calling the customer back at the telephone number of record). For all other inbound customer requests regarding (non-call detail) CPNI, Level 3 requires reasonable authentication in each case by reference to specific detailed information about the account or the particular services at issue. In addition, with respect to any online access that customers may have to CPNI, Level 3 employs password protection measures (and backup/reset processes) that do not rely upon readily available biographical information or account information. Finally, where any changes are requested or created by a customer with respect to account information such as address of record or online password access, Level 3 sends notification of such changes to the prior contact of record.

Through its policy and the training exercises, Level 3 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. Specifically, Level 3 has provided all employees with contact information to help ensure that appropriate business units and legal representatives of Level 3 receive rapid notification of any potential breaches. In turn, such business units and legal representatives have been informed of their reporting and record-keeping obligations under the Commission's CPNI rules with respect to any breaches thereof, including reporting such occurrences to law enforcement and later to customers if law enforcement approves. Level 3 will also maintain records relating to such breaches for a minimum of two years.