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**Bruce E. Beard**

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February 22, 2013

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

**Via ECFS**

**Re: HC CABLE OPCO, LLC d/b/a NULINK  
CPNI Officer's Compliance Certificate  
Docket 06-36**

Dear Ms. Dortch:

Attached please find the above-referenced CPNI Officer's Certificate which is being filed electronically in Docket 06-36. Should you have any questions, please contact us at (314) 394-1535.

Sincerely,

Bruce E. Beard

Enclosures

**OFFICER'S CPNI COMPLIANCE CERTIFICATE**

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

Date filed: February 22, 2013:

Name of company(s) covered by this certification: HC CABLE OPCO, LLC d/b/a NuLink Digital

Form 499 Filer ID: 828650

Name of signatory: Daniel Shoemaker

Title of signatory: Chief Executive Officer

I, Daniel Shoemaker, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

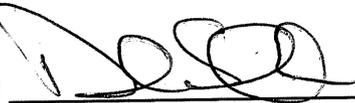
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules

The company 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 company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (e.g. instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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 it to enforcement action.

Signed



Daniel Shoemaker

**ATTACHMENT 1  
TO CPNI COMPLIANCE CERTIFICATE**

**Statement Regarding CPNI Operating Procedures**

HC CABLE OPCO, LLC d/b/a NuLink Digital's ("NuLink") written CPNI Operating Procedures ensure that NuLink will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of NuLink's CPNI Operating Procedures are:

- A requirement that NuLink have at all times a CPNI Compliance Supervisor to supervise the implementation of NuLink CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

NuLink does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations.