February 18, 2014
**Via ECFS Filing**

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

RE: Comity Communications, LLC
EB Docket No. 06-36; CY2013

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 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 the Comity Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

Carey Roesel
Consultant to Comity Communications, LLC

cc: Stevin Dahl - Comity
file: Comity - FCC CPNI
tms: FCCx1401

Enclosures
CR/gs

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

| | |
|---|---|
| Annual 64.2009(e) CPNI Certification for 2014: | Covering calendar year 2013 |
| Name of company(s) covered by this certification: | Comity Communications, LLC |
| Form 499 Filer ID: | 828470 |
| Name of signatory: | Stevin Dahl |
| Title of signatory: | Chief Executive Officer |

1. I, Stevin Dahl, 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*.

2. 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 §64.2001 *et seq*. of the Commission's rules.

3. The company has not taken actions (*i.e.*, 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.

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

5. 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 subject it to enforcement action.

Stevin Dahl, CEO

Stevin Dahl, Chief Executive Officer

2-12-2014

Date

**Attachments:** Accompanying Statement explaining CPNI procedures

**Attachment A**
**Statement of CPNI Procedures and Compliance**

# STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

## USE OF CPNI

Comity Communications, LLC, ("Comity") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Comity has trained its personnel not to use CPNI for marketing purposes. Should Comity elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

## PROTECTION OF CPNI/ALL COMPANIES

Comity has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

Comity has implemented appropriate safeguards for the disclosure of CPNI, including instituting procedures to (l) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact, online account access, or an in-store visit (e.g. use of verbal or online passwords without the use of readily available biographical or account information, or requiring a valid photo ID matching the customer's account information); and (2) providing notification to customers of account changes.

Comity does permit the use of CPNI for permissible purposes: (1) to initiate, provision, render, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of services that Comity provides; (3) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.

## DISCLOSURE OF CALL DETAIL OVER PHONE\ALL COMPANIES

Comity does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

## DISCLOSURE OF CPNI ONLINE\ALL COMPANIES

Comity does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

## DISCLOSURE OF CPNI AT RETAIL LOCATIONS\ALL COMPANIES

N/A. Comity does not have any retail locations and therefore does not disclose CPNI in-store.

## NOTIFICATION TO LAW ENFORCEMENT/ALL COMPANIES

Comity has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

Comity trains its employees as to when they are and are not permitted to use, pennitted access to, or permitted to disclose CPNI. Comity has a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.

Comity maintains *electronic* records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

## ACTIONS AGAINST DATA BROKERS/ALL COMPANIES

Company has not taken any actions against data brokers in the last year.

## CUSTOMER COMPLAINTS ABOUT CPNI BREACHES/ALL COMPANIES

Comity has never received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI.

## INFORMATION ABOUT PRETEXTERS/ALL COMPANIES

Comity has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI.

Comity trains its employees as to when they are and are not permitted to use, permitted access to, or permitted to disclose CPNI. Comity has a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.