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February 18, 2014

**BY ELECTRONIC FILING**

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

Re: **EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Goodlette Pine Ridge, LLC d/b/a Premier Executive Center, we are submitting herewith its **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for Calendar Year 2013** in the above-referenced proceeding.

Kindly address any questions concerning this submittal to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP

A handwritten signature in blue ink, appearing to read 'James M. Smith'.

James M. Smith  
Counsel for Goodlette Pine Ridge, LLC  
d/b/a Premier Executive Center

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

Annual 47 CFR §64.2009(e) CPNI Certification for 2014 covering the prior calendar year (2013)

Date filed: February 28, 2014

Name of company covered by this certification: Goodlette Pine Ridge, LLC d/b/a Premier  
Executive Center

Form 499 Filer ID: 824064

Name of signatory: Barry Bender

Title of signatory: Partner

I, Barry Bender, certify that I am a Partner 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 requirements Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

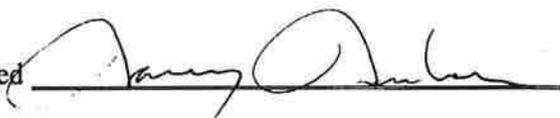
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001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

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) 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.

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.

Signed



Attachment: Accompanying Statement Explaining CPNI Procedures

Goodlette Pine Ridge, LLC, d/b/a Premier Executive Center

## STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

Goodlette Pine Ridge, LLC d/b/a Premier Executive Center ("PEC") provides the following as its Statement of CPNI compliance.

PEC provides wireline local and long distance telecommunication services, and internet access, to business customers, through a shared tenant service arrangement. PEC contracts with carriers to serve an executive suites building, and disaggregates the billing monthly so that it can be re-billed to the end user tenant.

PEC does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Telecommunications and internet access services are provided as an additional service to tenants who otherwise contract with PEC for office space. Should PEC 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.

PEC utilizes on-site equipment to capture all call detail from its various tenants. The premises manager is the only person with access to that data. The data is disaggregated and billed by DID number to the appropriate tenant. Standard monthly bills do not include call detail. Call detail is not provided to tenant customers unless upon request. Customers receive a paper bill including rent and communications charges. Customers do not have access to billing information on-line and cannot receive clarification on billing information via the telephone. Inquiries to PEC regarding the communications portion of the monthly invoice are handled in person with our tenants. A valid ID is required and verification with the customer of record prior to providing, investigation or discussing call detail with the customer.

PEC has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of and access to, CPNI.

PEC will fulfill law-enforcement requests for customer records if such request is provided via subpoena.

The company will check with the sender of the subpoena to validate its accuracy. Then the information is

sent by medium requested in the subpoena. All call records are sent only to the officer originating the subpoena and there is a special note added to the account stating that such documents were released to such officer. PEC has not been requested to provide CPNI by law-enforcement, however, should that event arise, the company will maintain a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI.

The company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

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

PEC does not have any retail locations other than a single center in Naples, Florida.

PEC has procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach thereafter, in accordance with FCC rules. The Company will maintain a record of any breaches discovered and notifications made to the USSS and FBI for at least two years. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

PEC has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

PEC has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.