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February 20, 2014

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

Filed Electronically Via ECFS

RE: Avalon Telecom Services, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Avalon Telecom Services, LLC, by its undersigned attorneys, hereby submits its 2013 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/tld

Enclosures

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

EB Docket 06-36

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

Date filed: February 14, 2014

Name of Company Covered by this Certification: Avalon Telecom Services, LLC

Form 499 Filer ID: 827846

Name of Signatory: Mark Bunnell

Title of Signatory: CEO

I, Mark Bunnell, 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 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.

The company has not received 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.

This Certification is dated this 14th day of February, 2014.

Mark Bunnell
CEO
Avalon Telecom Services, LLC

Customer Proprietary Network Information Certification
Attachment A

Avalon Telecom Services, LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Avalon Telecom Services, LLC provides private line telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Avalon Telecom Services, LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Avalon Telecom Services, LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

Safeguarding against pretexting

- Avalon Telecom Services, LLC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Avalon Telecom Services, LLC is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Avalon Telecom Services, LLC has an express disciplinary process in place for violation of the Avalon Telecom Services, LLC's CPNI practices and procedures. Avalon Telecom Services, LLC employees are required to review and abide by Avalon Telecom Services, LLC's Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

Avalon Telecom Services, LLC's use of CPNI

- Avalon Telecom Services, LLC uses CPNI for the following purposes:

  (1) To initiate, render, maintain, repair, bill and collect for services

  (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;

  (3) For network maintenance; and

  (4) As required by law.

- Avalon Telecom Services, LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Avalon Telecom Services, LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.

- Avalon Telecom Services, LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Avalon Telecom Services, LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

Additional safeguards

- Avalon Telecom Services, LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.

- Avalon Telecom Services, LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- Avalon Telecom Services, LLC designates one or more officers, as an agent or agents of the Avalon Telecom Services, LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).

- Avalon Telecom Services, LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.

- In the event of a breach of CPNI, Avalon Telecom Services, LLC will comply with all applicable breach notification laws.