



**PATRICK D. CROCKER**  
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February 24, 2014

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

*Filed Electronically Via ECFS*

RE: SkyNet360, LLC  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

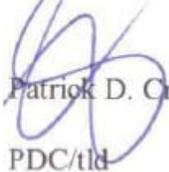
Dear Ms. Dortch:

SkyNet360, 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](mailto: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 11, 2014

Name of Company Covered by this Certification: SkyNet360, LLC

Form 499 Filer ID: IN PROCESS

Name of Signatory: Jose Camarillo

Title of Signatory: CEO

I, Jose Camarillo, 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.*

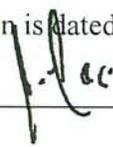
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *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 11 day of February, 2014.

  
\_\_\_\_\_  
Jose Camarillo  
CEO  
SkyNet360, LLC

## **Customer Proprietary Network Information Certification Attachment A**

SkyNet360, 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.

SkyNet360, LLC provides private services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. SkyNet360, LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is SkyNet360, 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**

- SkyNet360, 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. SkyNet360, 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**

- SkyNet360, LLC has an express disciplinary process in place for violation of the SkyNet360, LLC's CPNI practices and procedures. SkyNet360, LLC employees are required to review and abide by SkyNet360, 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.

### **SkyNet360, LLC's use of CPNI**

- SkyNet360, 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.

- SkyNet360, LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does SkyNet360, 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.
- SkyNet360, LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. SkyNet360, LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

### **Additional safeguards**

- SkyNet360, LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- SkyNet360, LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- SkyNet360, LLC designates one or more officers, as an agent or agents of the SkyNet360, 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).
- SkyNet360, 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, SkyNet360, LLC will comply with all applicable breach notification laws.