WOW!
INTERNET · CABLE · PHONE

February 27, 2014

Via ECFS

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

Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification; EB Docket No. 06-36;**

Dear Ms. Dortch:

We enclose for filing the Annual CPNI Certification for the companies referenced below. This Certification is being filed in compliance with 47 C.F.R. § 64.2009(e).

WideOpenWest Cleveland, LLC (Filer ID: 825955)
WideOpenWest Illinois, LLC (Filer ID: 825953)
WideOpenWest Michigan, LLC (Filer ID: 825954)
WideOpenWest Mid-Michigan, LLC (Filer ID: 829359)
WideOpenWest Ohio, LLC (Filer ID: 825952)
Sigecom, LLC (Filer ID: 820138)
Knology of Alabama, Inc. (Filer ID: 815486)
Knology of Florida, Inc. (Filer ID: 817562)
Knology of Georgia, Inc. (Filer ID: 817136)
Knology of South Carolina, Inc. (Filer ID: 802575)
Knology of Tennessee, Inc. (Filer ID: 821564)
Knology of the Plains, Inc. (Filer ID: 807851)
Knology of the Black Hills, LLC. (Filer ID: 820752)
Knology of Kansas, Inc. (Filer ID: 828767)
Knology Provider Solutions Group, Inc. (Filer ID: 828989)
Globe Telecommunications, Inc. (Filer ID: 803139)
Knology Community Telephone, Inc. (Filer ID: 807852)
Knology Total Communications, Inc. (Filer ID: 802146)
Knology of the Valley, Inc. (Filer ID: 803145)
Wiregrass Telecom, Inc. (Filer ID: 823574)
Valley Telephone, Co. LLC. (Filer ID: 803142)
WOW! Business Services, LLC. (New Filer)

If you have any questions, please feel free to call me. Thank you.

Sincerely,

Bruce Schoonover, Jr.
Vice President – Regulatory Compliance
WOW! Internet, Cable and Phone

cc: Best Copy and Printing, Inc. (via e-mail)

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 27, 2014

Name of company(s) covered by this certification: See Attachment B (collectively, the "Company")

Form 499 Filer ID: See Attachment B

Name of signatory: Bruce Schoonover, Jr.

Title of signatory: Vice President – Regulatory Compliance

Certification:

I, Bruce Schoonover, Jr., certify that I am an officer of the Company, 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 (See Attachment A) 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. Because the Company is not aware of any activity by data brokers or pretexters with respect to its customers' CPNI during the reporting year, the Company has no information to report with respect to the processes pretexters are using to attempt to access CPNI. The Company's steps taken to protect CPNI are described in the accompanying statement.

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: _____
By: Bruce Schoonover, Jr.
Its: Vice President – Regulatory Compliance

Attachment A

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

EB Docket 06-36

CPNI COMPLIANCE PROCEDURES STATEMENT

The Company ("WOW") has established the following policies and operating procedures to comply with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), 47 C.F.R. § 64.2001 *et seq.*

1. WOW has established policies that expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer. CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers.
2. WOW currently does not use CPNI for any purpose for which customer opt-out or opt-in approval is required under the Commission's rules. WOW does obtain customer opt-out approval (as described below) so that it may in the future use and disclose a customer's CPNI for the limited purpose of marketing communications-related services to that customer. The customer's approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by WOW remains in effect until the customer revokes or limits such approval or disapproval. Records of customers' CPNI approvals are kept for at least one year.
3. Prior to soliciting the customer's opt-out approval for use of CPNI, WOW provides written notification of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. The content of such notification complies with the Commission's rules. WOW keeps records of notification for at least one year. Opt-out notices are provided to customers at least every two years, and customers are given a minimum of 30-days to opt-out before they are presumed to have consented to use of their CPNI.
4. WOW has a system in place by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. WOW keeps an electronic record of each customer that has objected to our use of their CPNI, which record is reflected on the customer's account. These CPNI approval records are consulted prior to any use or disclosure of CPNI for any marketing purpose.
5. Employees receive CPNI protection training as to when employees are and are not authorized to use CPNI. WOW has an express disciplinary process in place, which includes termination of employment for violation of the CPNI protection requirements.
6. WOW's policy is to maintain a record, electronically or in some other manner, of any sales and marketing campaigns that use its customers' CPNI. Such records are maintained for all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, and will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. WOW will retain the record for a minimum of one year.
7. WOW has established a supervisory review process regarding carrier compliance with the CPNI rules for any outbound marketing situations. All sales or marketing campaigns initiated by WOW require approval by the Vice President of Marketing who is responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval. WOW will maintain records of carrier compliance for a minimum period of one year.

8. WOW does not provide call detail information to customers over the telephone. If the customer is able to provide call detail information to WOW during a customer-initiated call without our assistance, then WOW will discuss the call detail information provided by the customer. In other instances, we will mail call detail records to the address of record.
9. Customers can obtain access to CPNI online only after the customer is authenticated without the use of readily available biographical information or account information. Once authenticated, the customer may only obtain online access to CPNI through a password that is not prompted by asking for readily available biographical information, or account information.
10. WOW notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. The notice does not reveal the changed information, and is sent to the address of record, not to the new account information.
11. WOW will disclose CPNI to a customer who, at one of our retail locations, first presents to us or our agent a valid photo ID matching the customer's account information.
12. WOW has not experienced any CPNI breaches during the reporting year. However, WOW has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, WOW has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which record would be kept for a minimum of two years.

Attachment B

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

EB Docket 06-36

COMPANIES COVERED BY THIS CERTIFICATION

Company	**FCC Form 499 Filer ID**
WideOpenWest Cleveland, LLC	825955
WideOpenWest Illinois, LLC	825953
WideOpenWest Michigan, LLC	825954
WideOpenWest Mid-Michigan, LLC	829359
WideOpenWest Ohio, LLC	825952
Sigecom, LLC	820138
Knology of Alabama, Inc.	815486
Knology of Florida, Inc.	817562
Knology of Georgia, Inc.	817136
Knology of South Carolina, Inc.	802575
Knology of Tennessee, Inc.	821564
Knology of the Plains, Inc.	807851
Knology of the Black Hills, LLC.	820752
Knology of Kansas, Inc.	828767
Knology Provider Solutions Group, Inc.	828989
Globe Telecommunications, Inc.	803139
Knology Community Telephone, Inc.	807852
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