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February 28, 2014

VIA ELECTRONIC COMMENT FILING SYSTEM
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: 2014 CPNI Certification; EB Docket No. 06-36

Dear Ms. Dortch:

In accordance with 47 C.F.R. §64.2009(e), enclosed with this letter are four (4) CPNI Certifications for the following companies: Shenandoah Cable Television, LLC, Shentel Communications, LLC, Shentel Converged Services, Inc., and Shenandoah Telephone Company.

If you have any questions or require additional information, please do not hesitate to contact me at (540) 984-5320.

Sincerely,

Ann Flowers

Ann Flowers
Associate General Counsel

AF/sak
Enclosures

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013
EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

Date filed: March 1, 2014

Name of company covered by this certification: Shentel Converged Services, Inc.

Form 499 Filer ID: 825891

Name of signatory: Ray Ostroski

Title of signatory: Vice President - Legal

I, Ray Ostroski, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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 no information with respect to the processes pretexters are using to attempt to access CPNI, or what steps other companies are taking to protect CPNI.

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

Signed _____

SHENTEL CONVERGED SERVICES, INC.
STATEMENT OF CPNI OPERATING PROCEDURES

1. Except as described below, it is the policy of Shentel Converged Services, Inc. (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
b. For the purpose of providing inside wiring installation, maintenance, and repair services.
c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company does not disclose CPNI to any joint venture partners or independent contractors for marketing purposes.

3. The Company will only release CPNI to third party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to the subscribers of the Company.

4. The Company employs opt-out and, to the extent applicable, opt-in consent methods to determine a customer's CPNI approvals pursuant to FCC rules. The Company establishes each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber. This system enables the Company to determine the status of a customer's CPNI approval prior to the use of CPNI. The Company's policies mandate written notice to the FCC within five business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. With respect to customers' online access to their billing and other information, the Company does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2013.

9. The Company has the ability to notify customers automatically if any CPNI information on the account is changed. Customers are notified immediately via e-mail, if they have an e-mail address registered with the Company, or, if not, via U.S. Mail to the address of record. No notification will reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through http://www.fcc.gov/eb/cpni, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013
EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

Date filed: March 1, 2014

Name of company covered by this certification: Shenandoah Telephone Company

Form 499 Filer ID: 802200

Name of signatory: Ray Ostroski

Title of signatory: Vice President - Legal

I, Ray Ostroski, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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 no information with respect to the processes pretexters are using to attempt to access CPNI, or what steps other companies are taking to protect CPNI.

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

Signed

SHENANDOAH TELEPHONE COMPANY
STATEMENT OF CPNI OPERATING PROCEDURES

1. Except as described below, it is the policy of Shenandoah Telephone Company (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
b. For the purpose of providing inside wiring installation, maintenance, and repair services.
c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company does not disclose CPNI to any joint venture partners or independent contractors for marketing purposes.

3. The Company will only release CPNI to third party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to the subscribers of the Company.

4. The Company employs opt-out and, to the extent applicable, opt-in consent methods to determine a customer's CPNI approvals pursuant to FCC rules. The Company establishes each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber. This system enables the Company to determine the status of a customer's CPNI approval prior to the use of CPNI. The Company's policies mandate written notice to the FCC within five business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. With respect to customers' online access to their billing and other information, the Company does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2013.

9. The Company has the ability to notify customers automatically if any CPNI information on the account is changed. Customers are notified immediately via e-mail, if they have an e-mail address registered with the Company, or, if not, via U.S. Mail to the address of record. No notification will reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through http://www.fcc.gov/eb/cpni, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013
EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

Date filed: March 1, 2014

Name of company covered by this certification: Shentel Communications, LLC

Form 499 Filer ID: 827570

Name of signatory: Ray Ostroski

Title of signatory: Vice President - Legal

I, Ray Ostroski, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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 no information with respect to the processes pretexters are using to attempt to access CPNI, or what steps other companies are taking to protect CPNI.

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

Signed _____

SHENTEL COMMUNICATIONS, LLC
STATEMENT OF CPNI OPERATING PROCEDURES

1. Except as described below, it is the policy of Shentel Communications, LLC (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
b. For the purpose of providing inside wiring installation, maintenance, and repair services.
c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company does not disclose CPNI to any joint venture partners or independent contractors for marketing purposes.

3. The Company will only release CPNI to third party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to the subscribers of the Company.

4. The Company employs opt-out and, to the extent applicable, opt-in consent methods to determine a customer's CPNI approvals pursuant to FCC rules. The Company establishes each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber. This system enables the Company to determine the status of a customer's CPNI approval prior to the use of CPNI. The Company's policies mandate written notice to the FCC within five business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. With respect to customers' online access to their billing and other information, the Company does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2013.

9. The Company has the ability to notify customers automatically if any CPNI information on the account is changed. Customers are notified immediately via e-mail, if they have an e-mail address registered with the Company, or, if not, via U.S. Mail to the address of record. No notification will reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through http://www.fcc.gov/eb/cpni, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013
EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

Date filed: March 1, 2014

Name of company covered by this certification: Shenandoah Cable Television, LLC

Form 499 Filer ID: 829505

Name of signatory: Ray Ostroski

Title of signatory: Vice President - Legal

I, Ray Ostroski, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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 no information with respect to the processes pretexters are using to attempt to access CPNI, or what steps other companies are taking to protect CPNI.

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

Signed _____

SHENANDOAH CABLE TELEVISION, LLC
STATEMENT OF CPNI OPERATING PROCEDURES

1. Except as described below, it is the policy of Shenandoah Cable Television, LLC (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
b. For the purpose of providing inside wiring installation, maintenance, and repair services.
c. For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.
d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company does not disclose CPNI to any joint venture partners or independent contractors for marketing purposes.

3. The Company will only release CPNI to third party vendors pursuant to a written agreement containing the appropriate restrictions regarding the confidentiality and safeguarding of customer information, and then only for the limited purpose of initiating, rendering, billing and/or collecting for services rendered to the subscribers of the Company.

4. The Company employs opt-out and, to the extent applicable, opt-in consent methods to determine a customer's CPNI approvals pursuant to FCC rules. The Company establishes each subscriber's individual privacy preferences at the initiation of service and allows for changes to those preferences as validly requested by the subscriber. This system enables the Company to determine the status of a customer's CPNI approval prior to the use of CPNI. The Company's policies mandate written notice to the FCC within five business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. With respect to customers' online access to their billing and other information, the Company does not provide online access to any CPNI until the customer requesting such access provides a password that has been established by the customer without the use of readily available biographical information or account information.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2013.

9. The Company has the ability to notify customers automatically if any CPNI information on the account is changed. Customers are notified immediately via e-mail, if they have an e-mail address registered with the Company, or, if not, via U.S. Mail to the address of record. No notification will reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through http://www.fcc.gov/eb/cpni, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.