

February 28, 2014

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual Certification of TDS Baja Broadband, LLC

Dear Ms. Dortch:

TDS Baja Broadband, LLC, by its attorneys and on behalf of the wholly-owned subsidiaries identified in this submission (collectively, "Baja"), hereby files its annual CPNI certification pursuant to the requirements of Section 64.2009(e) of the Commission's rules.

This submission has been redacted for public inspection, as permitted by the *Report and Order* released by the Commission in the above-referenced docket on April 2, 2007. See *Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927, 6954 n.167 (2007). A confidential, unredacted version of this submission will be filed today by hand.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,



Yaron Dori
Daniel H. Kahn
Counsel for Baja

Enclosure

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013 Calendar Year
EB Docket No. 06-36

Companies covered by this certification: TDS Baja Broadband, LLC and wholly owned subsidiaries as of December 31, 2013 ("Baja").¹

Form 499 Filer IDs: Please see the attached list.

Signatory Name: James W. Butman

Signatory Title: Vice President, TDS Baja Broadband, LLC.

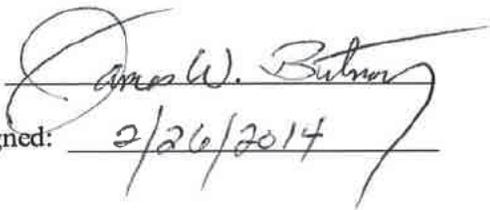
I, James W. Butman, certify that I am a Baja officer, acting as an agent of the company, have personal knowledge that Baja has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Baja's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Baja 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 in the past year.

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

Signed:



Date Signed:

2/26/2014

¹ On August 1, 2013, TDS Telecommunications Corporation purchased select assets of Baja Broadband, LLC, a cable company headquartered in Alamogordo, New Mexico. The purchased Baja Broadband LLC company assets are now part of TDS Baja Broadband, LLC.

Baja Statement Explaining CPNI Procedures

This statement accompanies the annual certification of Baja or the “Company” as required 47 C.F.R. § 64.2009(e). It describes Baja’s operating practices, procedures, systems, processes, and controls designed to ensure compliance with the Commission’s CPNI rules.

A. Approval Required for Use of CPNI

Consistent with the Commission’s rules, Baja uses CPNI to market service offerings to customers that are within the category of service to which the customer already subscribes (“Total Service Approach”) or to market services formerly known as adjunct-to-basic services. Baja’s operating practices are not designed to use, disclose, or allow access to CPNI for any purpose requiring customer approval under the FCC’s rules found at 47 C.F.R. § 64.2007.

B. Safeguards for CPNI Use

Baja educates and trains its employees regarding the appropriate use and disclosure of CPNI. The Company maintains written policies, including CPNI policies, communicated to employees when they join the Company. After reviewing these policies, employees must acknowledge that they have read and understand them. In addition, employees are required to complete CPNI training soon after they are hired. Further, employees who function in a customer advisory role such as customer care representatives are provided further guidance on the proper handling of CPNI via procedures. Adherence to procedure is tested through call monitoring, and where issues are identified, they are escalated and resolved, as appropriate.

C. Safeguards Against CPNI Disclosure

Baja takes reasonable measures to discover and protect against attempts by unauthorized third parties to gain access to customer CPNI by securing its network, using password systems, using notification systems, and monitoring for unauthorized access.



It Baja’s practice to authenticate in-bound callers using either a password or an account-based method. If a caller wishes to discuss sensitive information including call detail records, procedures require password authentication. Otherwise, in accordance with procedures, customer care representatives may use account-based authentication to discuss less sensitive information. Adherence to these procedures is tested by through call monitoring, and where issues are identified they are escalated and resolved, as appropriate. The password systems used

for in-bound calls are a Personal Identification Number (“PIN”) -based system. When customers call Baja customer service lines, customer care representatives ask customers to authenticate themselves with a PIN.



It is Baja’s practice to notify customers whenever a password, online account, or address of record is created or changed on an existing account. Notifications are triggered systematically at the database level when the change is made. The notifications are completed in a timely fashion using) letters sent by postal mail to the billing address of record. As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information.

D. Notification of CPNI Breaches

Baja maintains processes through which employees or customers can report a possible breach, including but not limited to unauthorized access to or use of CPNI. If a report indicating that CPNI breach may have occurred, or if a potential breach is detected through the monitoring processes discussed above, Baja employees investigate. If a breach were to occur, Baja’s practice requires that breach to be reported to law enforcement and to the customer in accordance with the Commission’s rules.

It is Baja’s practice to maintain its records of any breaches reported for at least two years.

State	TDS Entity	499 Filer ID
AZ	TDS Baja Broadband, LLC	826819
CO	TDS Baja Broadband, LLC	826819
NM	TDS Baja Broadband, LLC	826819
NV	TDS Baja Broadband, LLC	826819
TX	TDS Baja Broadband, LLC	826819
UT	TDS Baja Broadband, LLC	826819