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March 2, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance Certification; EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Liberty Contracting and Consulting LLC ("Liberty") and pursuant to 47 C.F.R. § 64.2009(e), attached please find Liberty's 2014 Annual Customer Proprietary Network Information compliance certification covering calendar year 2013.

Please contact the undersigned at (202) 342-8614 if you have any questions regarding this filing.

Respectfully Submitted,

Denise N. Smith

Counsel for Liberty Contracting and Consulting LLC

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

EB Docket No. 06-36

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

Name of Company: Liberty Contracting and Consulting LLC

Form 499 Filer ID: 826971

Name of Signatory: Frank Hendrie

Title of Signatory: Principal Member

I, Frank Hendrie, certify that I am an officer of Liberty Contracting and Consulting LLC ("Liberty"), and acting as an agent of Liberty, that I have personal knowledge that Liberty has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's" or "FCC's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

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

Liberty has not taken any actions (instituted proceedings or filed petitions at state commissions, the court system, or at the FCC) against data brokers during the above referenced certification period. Liberty has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.,* through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI are described in the attached statement that summarizes Liberty's operating procedures for compliance with the Commission's CPNI rules.

Liberty has not received any customer complaints during the above referenced certification period concerning the unauthorized release of CPNI.

Frank Hendrie

Principal Member

Liberty Contracting and Consulting LLC

Date: Feb 28, 2014

Customer Proprietary Network Information Certification

Attachment A

Liberty Contracting and Consulting LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, 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.

Safeguarding against pretexting

- Liberty 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. Liberty is committed to notifying 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

- Liberty personnel: (a) understand what CPNI is, (b) join in and carry-out Liberty's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

- Liberty also requires all outside Dealers and Agents to review Liberty's CPNI practices and procedures and to acknowledge receipt and review thereof.

Liberty's use of CPNI

- Liberty uses CPNI for the following purposes:
  - To initiate, render, maintain, repair, bill and collect for services;
  - 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;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
  - To market services formerly known as adjunct-to-basic services; and
  - To market additional services to customers *with the receipt of informed consent via the use of opt-in or out-out, as applicable.*

- Liberty does not disclose or permit access to CPNI to track customers that call competing service providers.

- Liberty discloses and permits access to CPNI where required by law (*e.g.,* under a lawfully issued subpoena).

Customer approval and informed consent

- Liberty has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

  - Prior to any solicitation for customer approval, Liberty notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI.
  - Liberty uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or in 47 USC 222 and the FCC's CPNI rules.
  - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
  - Records of approvals are maintained for at least one year.
  - Liberty provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
  - The content of Liberty's CPNI notices comply with FCC rule 64.2008(c).

  Opt-out

  - Liberty uses opt-out for the marketing of communications related services outside the category of service to which the customer subscribes and for affiliate marketing of any communications related services. When Liberty uses opt-out approval, Liberty provides notification by electronic or written methods and waits at least 30 days after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Liberty provides customers with opt-out notifications every two years. When using e-mail for opt-out notices, Liberty complies with the additional requirements set forth in FCC rule 64.2008(d)(3). Additionally, Liberty makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, seven days a week.

  Opt-in

  - Liberty uses opt-in approval for marketing by independent contractors and joint venture partners and for then marketing of non-communications related services by itself and its affiliates. When Liberty uses opt-in approval, Liberty provides notification consistent with FCC rule 64.2008(c).

  One time use

  - After authentication, Liberty uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with FCC rule 64.2008(f).

Additional safeguards

- Liberty maintains for at least one year records of all marketing campaigns that use its customers' CPNI, including a description of each campaign and the CPNI used, the products offered as part of the campaign, and instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI. Such campaigns are subject to a supervisory approval and compliance review process, the records of which also are maintained for a minimum of one year.

- Liberty has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- Liberty designates one or more officers, as an agent or agents of the Liberty, 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).

- Liberty will provide written notice to the Commission in accordance with the requirements of FCC rule 64.2009(f) if ever its opt-out mechanisms malfunction in the manner described therein.

- For customer-initiated telephone inquiries regarding or requiring access to CPNI, Liberty authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then Liberty only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.

- For online customer access to CPNI, Liberty authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, Liberty utilizes a customer-established password to authorize account access. Liberty establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of FCC rule 64.2010(e).

- Liberty notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

- Liberty may negotiate alternative authentication procedures for services that Liberty provides to business customers that have both a dedicated account representative and a contract that specifically addresses Liberty's protection of CPNI.

- In the event of a breach of CPNI, Liberty has practices and procedures in place to notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Liberty to delay notification, or Liberty and the investigatory party agree to an earlier notification. Liberty will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.