

## Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

### EB Docket 06-36

**Annual 64.2009(e) CPNI Certification for:** January 1, 2013 through December 31, 2013.

**Date filed:** March 3, 2014.

**Name of companies covered by this certification:** Citynet, LLC on behalf of its subsidiary Citynet Holdings, LLC and its affiliates (*i.e.*, Citynet West Virginia, LLC, Citynet Pennsylvania, LLC, Citynet Ohio, LLC, Citynet Indiana, LLC, Citynet Illinois, LLC, and Citynet Kentucky, LLC).

**Form 499 Filer ID:** 824404

**Name of signatory:** Jeffrey A. Ray

**Title of signatory:** General Counsel/Secretary

I, Jeffrey A. Ray, certify that I am an officer of the above-referenced companies (hereinafter collectively, 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.*

Following is a 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 adopted a CPNI policy that is consistent with the rules and regulations promulgated by the Commission in 47 C.F.R. § 64.2001 *et seq.* Each employee of the Company has been required to read the CPNI policy and has been strongly encouraged to ask questions if there are any concerns. Those employees of the Company that interact with the public and, as the result, may interact with customers and pre-texters have been provided additional training by their supervisors with respect to the Company's CPNI policy. Employees are required to refresh their knowledge of the Company's CPNI policy on a quarterly basis.

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. To the best of my knowledge and belief, the Company has not had any encounters within the past year with pre-texters and, therefore, has no knowledge of the processes pre-texters are using to attempt to access CPNI.

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

Signed \_\_\_\_\_ /s/  
Jeffrey A. Ray, General Counsel/Secretary