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March 3, 2014

VIA ECFS

Marlene H. Dortch
Office of the 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 Secretary Dortch:

On behalf of Atlantic Crossing Ltd. ("Atlantic Crossing") and pursuant to 47 C.F.R. § 64.2009(e), attached please find Atlantic Crossing'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 Atlantic Crossing Ltd.

Attachment

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

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2014 Covering the Prior Calendar Year 2013

Name of Filer: Atlantic Crossing Ltd.

Form 499 Filer ID: 827659

Name and Title of Signatory: Lawrence Fuccella, President

I, Lawrence Fuccella, certify that I am an officer of Atlantic Crossing Ltd. ("Atlantic Crossing" or the "Company"), and acting as an agent of Company, that I have personal knowledge that Atlantic Crossing 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 Atlantic Crossing's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

Atlantic Crossing has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. The Company 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 include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

Atlantic Crossing has not received any customer complaints during the period covered by this certification concerning the unauthorized release of CPNI.

Lawrence Fuccella

Lawrence Fuccella

President

Atlantic Crossing, Ltd.

Date: March 3, 2014

Customer Proprietary Network Information Certification
Attachment A

Atlantic Crossing Ltd. (the "Atlantic Crossing") 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

- Atlantic Crossing takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Atlantic Crossing 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

- Any Atlantic Crossing Employee(s), or future Employee(s) ("Employees"), will be required to undergo training as to when they are and are not authorized to use CPNI. Atlantic Crossing's policies ensure that it will have an express disciplinary process in place at or before the time it has Employees. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

Atlantic Crossing's use of CPNI

- Atlantic Crossing may use 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 comply with applicable law.

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

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

- Atlantic Crossing does not use CPNI for any purposes that require customer approval to do so. Atlantic Crossing does not use CPNI for marketing purposes and therefore has no records to maintain regarding marketing campaigns that use its customers' CPNI. If this policy changes in the future, Atlantic Crossing will ensure its procedures for customer notification and approval, and Atlantic Crossing's record keeping policies, comply with the FCC's applicable regulations. Atlantic Crossing has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- Atlantic Crossing does not disclose or provide access to CPNI to independent contractors or joint venture partners.

- Atlantic Crossing does not disclose CPNI to customers in response to customer-initiated telephone calls. Additionally, Atlantic Crossing does not disclose CPNI over the Internet. If this policy changes in the future, Atlantic Crossing will establish authentication methods and notification procedures in compliance with the FCC's rules, *47 C.F.R. § 64.2010.*

- In the event of a breach of CPNI, Atlantic Crossing will 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 Atlantic Crossing to delay notification, or Atlantic Crossing and the investigatory party agree to an earlier notification. Atlantic Crossing 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.