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March 1, 2022

Consumer Interest Section
Office of the Attorney General of Georgia
40 Capitol Square, SW
Atlanta, GA 30334

RE: LMK Communications, LLC
Annual CPNI Certification Filing for CY 2021

Dear Sir/Madam:

Enclosed please find a copy of the FCC Annual 47 C.F.R. §64.2009(e) Officer's Certification of Customer Proprietary Network Information (CPNI) Compliance for Calendar Year 2021 that includes LMK Communications, LLC in compliance with the annual CPNI certification requirement of the Office of the Attorney General of Georgia.

Any questions you may have regarding this filing should be directed to my attention at 304-389-0818 or via email to steve.hamula@segra.com.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink that reads "Steven Hamula". The signature is stylized with a large "S" and a long horizontal stroke at the end.

Steven Hamula
Associate General Counsel
Enclosures

LMK Communications, LLC
DBA Segra
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FILED ELECTRONICALLY VIA ECFS

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

Re: CPNI Compliance Certification and Accompanying Statement

EB Docket No. 06-36

Lumos Networks Inc., Lumos Networks of West Virginia Inc., Lumos Networks LLC, LMK Communication, LLC, South Carolina Telecommunications Group Holding, LLC d/b/a Segra, South Carolina Net, Inc. d/b/a Spirit Telecom, FRC, LLC, Spirit Tower Company, LLC, FiberNet of Ohio, LLC; FiberNet of Virginia, Inc.; FiberNet Telecommunications of Pennsylvania, LLC; (collectively the "Segra Companies")

Dear Ms. Dortch:

In accordance with Section 64.2009(e) of the Commission's rules, the above-referenced Segra Companies hereby submit their CPNI Certifications and Accompanying Statements for 2022 covering the prior calendar year 2021.

If you have any questions or require additional information relative to this filing, you may reach me at (304) 389-0818 or email steve.hamula@segra.com.

Sincerely yours,

A handwritten signature in black ink that reads "Steven Hamula". The signature is stylized with a large "S" and a long horizontal stroke at the end.

STEVEN HAMULA
Associate General Counsel
Segra Companies

SH/s
Enclosures

Segra
Annual 47 CFR § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2022 (covering calendar year 2021)

Date filed: March 1, 2022

Names of companies covered by this certification: FiberNet of Ohio, LLC; FiberNet of Virginia, Inc.; FiberNet Telecommunications of Pennsylvania, LLC; LMK Communications, LLC; Lumos Networks Inc.; Lumos Networks LLC; Lumos Networks of West Virginia Inc.; South Carolina Telecommunications Group Holdings, LLC; South Carolina Net, Inc. d/b/a Spirit Telecom; FRC, LLC; PalmettoNet Inc. (collectively the “Segra Companies”)¹

Form 499 Filer ID: 834778

Name of signatory: Robin Dunson

Title of signatory: Chief Legal Officer

I, Robin Dunson, certify that I am an officer of the Segra Companies, and acting as an agent of the Segra Companies, that I have personal knowledge that the Segra Companies have established operating procedures that are adequate to ensure compliance with the Commission’s CPNI rules.

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

The Segra Companies have not taken actions against data brokers in the past year.

The Segra Companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The Segra Companies represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The Segra Companies

¹ On Oct. 5, 2021, Cox Communications acquired the Segra Companies. As a part of that transaction, the Segra Companies’ prior ownership separated the residential and commercial service segments of its subsidiaries that had previously operated under the brand name “Segra.” The Segra Companies comprise the commercial services segment of the former “Segra.” See Cox Newsroom, *Cox Communications Completes Acquisition of Segra's Commercial Enterprise and Carrier Business* (Oct. 5, 2021), <https://newsroom.cox.com/2021-10-05-Cox-Communications-Completes-Acquisition-of-Segras-Commercial-Enterprise-and-Carrier-Business>; Notice of Domestic Section 214 Authorizations Granted, *Public Notice*, DA 21-792 (WCB July 6, 2021); Domestic Section 214 Application Filed For The Transfer Of Control Of Certain Subsidiaries Of MTN Infrastructure TopCo LP To Cox Communications, Inc., *Public Notice*, 36 FCC Rcd 9370 (WCB 2021).

also acknowledge that false statements and misrepresentation to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.

Signed: *Robin Dunson*
Robin Dunson, Chief Legal Officer, Segra Companies

Attachment: Accompanying Statement explaining CPNI procedures

Segra CPNI Compliance Statement

The Segra Companies' procedures ensure that they are in compliance with the FCC's CPNI rules in section 64.2001 et seq. by the following:

Procedures and Training. The Segra Companies have established procedures and trained employees having access to, or occasion to use CPNI, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(h)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(h)(1)). The Segra Companies have established procedures and trained employees having access to, or occasion to use CPNI, to be aware of restrictions regarding uses and sharing of CPNI. Prior to initiation of any program for use of CPNI for marketing, the Segra Companies will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements.

Customer Notification and Authorization Process. The Segra Companies do not use CPNI for marketing and thus, at this time, have not provided the relevant notice to customers. Prior to any planned use of CPNI for marketing, the Segra Companies will initiate the notification and customer approval process. The Segra Companies do not provide CPNI to third parties except as necessary to provide the service requested by the customer, upon affirmative written request by the customer to any person designated by the customer, or as otherwise required or permitted by law. Prior to any planned use or disclosure of CPNI for which opt-in approval is required, the Segra Companies will establish procedures to put in place and implement a notification and opt-in process.

Recordkeeping and Supervisory Review. Before using CPNI in a manner that requires customer approval, the Segra Companies will establish a supervisory review process for outbound marketing situations and will develop required recordkeeping systems.

Safeguards. The Segra Companies have taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Among other things, the Segra Companies have implemented the following procedures: (1) authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits; (2) provided customers with on-line access to customer account information for which Segra Companies have initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e); (3) implemented password back-up authentication procedures in compliance with Section 64.2010(e); (4) implemented procedures to notify customers of account changes; (5) put in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required.

Procedures for Notifying Law Enforcement of CPNI Security Breaches. The Segra Companies have adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and notification to customers.