



Pillsbury Winthrop Shaw Pittman LLP  
1200 Seventeenth Street, NW | Washington, DC 20036 | tel 202.663.8000 | fax 202.663.8007

Glenn S. Richards  
tel 202.663.8215  
glenn.richards@pillsburylaw.com

March 3, 2015

**FILED VIA ECFS**

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

Re: **EB Docket No. 06-36**  
**Annual 47 C.F.R. 64.2009(e) CPNI Certification for 2014**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, submitted herewith on behalf of Tellan Network Technologies, Inc. (“TelLan”), (d/b/a VoIPnet Technologies) is the carrier’s CPNI certification and accompanying statement for the calendar year 2014. TelLan was acquired by DSCI LLC (“DSCI”) on October 1, 2014. Accordingly, the attached certification covers the period between January 1, 2014 and September 30, 2014. DSCI also filed a CPNI Certification via ECFS.<sup>1</sup>

Should any questions arise regarding this submission, please contact the undersigned.

Sincerely yours,

\_\_\_\_\_/s/\_\_\_\_

Glenn S. Richards

---

<sup>1</sup> See <http://apps.fcc.gov/ecfs/comment/view?id=60001019827> , filed February 24, 2015.

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014.<sup>1</sup>

1. Date filed: 03/03/2015
2. Name of company covered by this certification: TelLan Network Technologies, Inc.
3. Form 499 Filer ID: 826034
4. Name of signatory: Stephen W. LaMarche
5. Title of signatory: CFO

I, Stephen W. LaMarche certify that I am an officer of the company named above, 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.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, in the court system, or at the Commission) against data brokers in the past year.

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

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed   
Stephen LaMarche, CFO

Attachment: Statement Explaining CPNI procedures

---

<sup>1</sup> The instant certification covers the period from January 1, 2014 – September 30, 2014. TelLan was acquired by DSCI LLC ("DSCI") on October 1, 2014. DSCI, 499 Filer ID 821296, also filed a CPNI Certification Statement in Docket No. 06-36.

## Description of CPNI Policies and Procedures

TelLan Network Technologies, Inc. maintains the security of CPNI. The company has security measures in place to protect this data from external attacks to its website and improper verbal requests for data via personal contacts with TelLan Technologies, Inc's customer care. TelLan Network Technologies, Inc's web portal is password protected; it allows customers to view only their personal configuration information. The web portal has login/password security and uses encryption to ensure the security of this information. The web portal limits customers to accessing their specific data only. The company has procedures in place that allow only customers of record and only authorized contacts to obtain specific call detail information.

TelLan Network Technologies, Inc. has the appropriate security on all elements of its data network and systems. There are firewalls controlling access, data is encrypted and all users require a security code to log on to the network and can only access information needed for their job function.

The company's employees have been trained in the proper use of CPNI, and the company will enforce strict disciplinary measures for employees that misuse or mishandle CPNI. TelLan Network Technologies, Inc. does not provide CPNI to any third parties and does not sell CPNI.