



February 6, 2006
VIA ECFS

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

RE: **Access Integrated Networks**
EB Docket No. 06-36
EB-06-TC-060 - Certification of CPNI Filing (02/06/06)

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 30, 2006, Access Integrated Networks hereby files a copy of its 2006 Annual Compliance Certification of CPNI as required by section 64.2009(e) of the Commission's rules. As directed by the Public Notice, please include this in EB Docket No. 06-36.

Please contact me at 407-740-3006 or croesel@tminc.com if you have any questions about this filing.

Sincerely,

Carey Roesel
Consultant to Access Integrated Networks

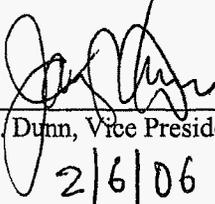
Enclosure

cc: Byron McCoy (byron.mccoy@fcc.gov)
Best Copy and Printing, Inc. (fcc@bcpweb.com)

**ANNUAL
OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

I, [James P. Dunn], certify and state that:

1. I am the Vice President of Sales & Marketing of Access Integrated Networks and have personal knowledge of Access Integrated Networks' operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Access Integrated Networks' operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining the Access Integrated Networks' operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



James P. Dunn, Vice President Sales & Marketing

Date

2/6/06

Exhibit A

Statement of CPNI Procedures and Compliance

Access Integrated Networks does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Access Integrated Networks elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Access Integrated Networks ensures that its employees do not improperly use or disclose CPNI by requiring that all access to CPNI be approved by a supervisor with knowledge of the FCC's CPNI requirements.

Access Integrated Networks has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to CPNI (see attached Company Compliance policies, which must be signed by employees). Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Access Integrated Networks maintains a record of all sales and marketing campaigns that use CPNI.

Access Integrated Networks maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Chapter: 100. Employment
Section: 120. Corporate Compliance
Main Topic: Corporate Compliance Program Policy (Conduct, Ethics, Confidentiality)
Document Date: January 2006

Purpose and Intent: At **Access Integrated Networks** we are committed to “**doing the right thing.**” We will conduct ourselves responsibly and with integrity. Each of us has an obligation to uphold the high ethical standards of the company. A Corporate Compliance Policy and Program has been established to ensure that each employee, contractor, consultant, or sales channel understands his or her responsibility and acts accordingly. The standards are created to guide you in both routine and unusual situations you may encounter during your affiliation with **Access Integrated Networks.**

It is mandatory that the highest standards of conduct be observed in all contacts made by company employees, contractors, consultants, members of sales channels with customers, shareholders, suppliers, governmental officials, fellow employees, contractors, consultants, members of sales channels, and the general public. To further this objective, **Access Integrated Networks** has written policies dealing with rules of conduct to be used in conducting the business affairs of the company whether it be by its employees, officers, contractors, sales channels, or others in any way representing our company.

It is the policy of the company to comply with all applicable laws, to act fairly, impartially, in an ethical and proper manner. The highest standards of conduct are required of our employees and all other persons who act on our behalf, which includes contractors, consultants, officers and sales channels. **Violations of the policies will result in disciplinary action, up to and including termination of employment or termination of contract and/or channel.** It is also company practice to encourage anyone to ask questions, seek guidance, and express any concerns they may have. However, no set of policies or guidelines can hope to cover all situations **Access Integrated Networks** may encounter.

Upon employment, contract or sales channel agreement; you will be asked to sign a Confidentiality Statement, which is part of this program. All new employees, agents, and/or other channels of support and service will be trained in the Corporate Compliance Program upon hire and annually thereafter. They will be required to sign a Statement of Compliance indicating they understand and fully agree with our company philosophy of “**doing the right thing.**”

Violations of the Corporate Compliance Program or the Confidentiality Statement will result in disciplinary action, up to and including termination, or termination of contract and/or agreement.

Confidential Information: **Access Integrated Networks** believes its confidential proprietary information is an important asset in the operation of its business and prohibits the unauthorized use or disclosure of this information. **Access Integrated Networks** respects the property rights of other companies and our customers rights to their proprietary information and requires its employees, consultants, contractors, members of sales channels to fully comply with both the spirit of the letter of the U. S. and foreign laws and regulations protecting such rights. **Access Integrated Networks'** success is dependent upon the strict adherence by employees, consultants, contractors, and members of sales channels to this policy and all applicable standards and procedures. Failure to do so may result in termination of employment or contract.

Such confidential information includes, but is not limited to:

- Agent Information/Lists
- Customer Service Records (CSR's)
- Employee Records/Lists
- Customer Proprietary Network Information (CPNI)
- Compensation Data
- Use of an ILEC's name other than direct customer interaction and necessity
- Computer Processes or Contents
- Computer Programs and Codes
- Technological Data of Any Type
- Customer Lists and/or Information

Created November 2002
Modified January 2004

Research and Development Strategies
Customer Preferences
Marketing Strategies
Financial Information
Proprietary Production Processes
Pending Projects and Proposals

The continued success of **Access Integrated Networks** is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees, consultants, contractors, and members of sales channels owe a duty to **Access**, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

Access Integrated Networks will comply with all applicable laws and regulations and expects its directors, officers, employees, consultants, contractors, and members of sales channels to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest or unethical behavior, including sharing confidential information.

Customer Service Record (CSR): While employed by or contracted with **Access Integrated Networks** the employee, nor its contractors, consultants, sales channels and/or agents may not access a prospective Customer Service Record (CSR) without verbal consent or a signed letter of authorization to use or share this information with its Agents any affiliates, or other companies that might request a release of information.

Customer Proprietary Network Information (CPNI): CPNI is information that **Access** can obtain with regards to numbers consumers call, how much they pay for those services, including the Customer Service Record (CSR), and other personal and sensitive information about their telephone usage. Under Federal law, **Access** has a duty to protect this information on the customer's behalf. Customer information will not be given out or shared without consent, or proper law enforcement involvement with a subpoena.

**Access Integrated Networks
Corporate Compliance Officer
Human Resources Department
Or
The Regulatory Department**

Access Integrated Networks will not abide by or permit any form of retribution against any person, who in good faith, reports known or suspected violations of company policy or ethics.

I have read and understand the above policy. I understand, agree to abide and be bound by the provisions set forth in the Corporate Compliance Program Policy. I understand that noncompliance with this policy can result in disciplinary action, up to and including termination.

Employee/Agent/Contractor Signature Date

Printed Name