

February 6, 2006

Eric Fishman
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Electronic Filing

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CPNI Compliance Certification of IIJ America Inc.
WC Docket No. 05-196

Dear Sir or Madam:

Submitted herewith please find the CPNI Compliance Certificate of IIJ America Inc. in the above-referenced document, filed pursuant to the Commission's Public Notice, DA 06-223, released January 30, 2006. The address of IIJ America Inc. is 1211 Avenue of the Americas, Suite 2900, New York, New York 10036.

Should any questions arise concerning the attached filing, please contact the undersigned counsel.

Sincerely,



Eric Fishman
Counsel to IIJ America Inc.

Attachment

cc: Byron McCoy
Telecommunications Consumers Division
Enforcement Division
Federal Communications Commission
Room 4-A234
445 12th Street, SW
Washington, DC 20554

Best Copy and Printing, Inc. (BCPI) via email: fcc@bcpiweb.com

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Certification of CPNI Filing February 6, 2006
EB-06-TC-060

Carrier Name, Address, Phone Number, Contact Person

IIJ America Inc.
1211 Avenue of The Americas, Suit 2900
New York, N.Y 10036
Tel : 212-440-8080
Contact Person: Isao Momota, President and CEO

IIJ America Inc ("IIJA"), which holds international operating authority under the Communications Act of 1934, as amended (the "Act"), operates as an Internet Service Provider, and does not provide domestic or international telecommunications service to its subscribers. As such, IIJA commonly does not have access to many features that are common in a modern telecommunications network which potentially provide access to many elements of consumer proprietary network information ("CPNI") by virtue of the customer relationship. To the extent it has access to information concerning the quantity, technical configuration, type, destination, location and amount of use of service offered to its subscribers, that service is an information service, as defined by the Act, and IIJA has no access to the CPNI of its subscribers' telecommunications services, or to information contained in bills pertaining to telephone exchange service or telephone toll service received by its customers. In the instances where IIJA potentially has CPNI that must be protected under the Communications Act and the rules of the Federal Communications Commission (the "Commission"), the following certification applies.

- IIJA has implemented a policy whereby it does not utilize or disclose a customer's CPNI at any time or for any purpose other than those permitted or required by law.
- IIJA's policy regarding CPNI expressly forbids any disclosure of a customer's CPNI to a third party. IIJA's standard policy and procedures for discipline address any instance where an employee would either intentionally or unintentionally disclose CPNI to a third party.
- IIJA plans to implement a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- IIJA educates and trains its employees regarding the appropriate use of CPNI. IIJA plans to establish disciplinary procedures should an employee violate the CPNI procedures established by IIJA.
- IIJA plans to maintain a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. IIJA also plans to maintain a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- IIJA plans to establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a

minimum period of one year. Specifically, IIA's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.

- In accordance with Section 64.2009(e) of the Commission's rules, an officer of IIA has executed a compliance certificate stating that the officer has personal knowledge that IIA has established operating procedures that ensure compliance with the Commission's CPNI rules.

Certification of CPNI

I, IJ America Inc., hereby state and declare:

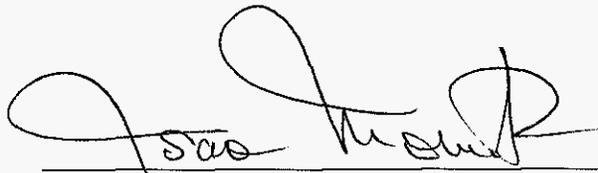
1. I am the President and CEO, of IJ America Inc, a Internet Service Provider holding International Global Internet Backbone to provide the Internet services and IP related services such as Email and Web Hosting to the enterprise customers.

2. As an officer of IJ America Inc, I certify that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's Customer Proprietary Network Information ("CPNI") rules at Part 64.2001, *et seq.*

3. I am familiar with the facts contained in the foregoing Statement of CPNI Procedures and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of February, 2006.

A handwritten signature in black ink, appearing to read 'Isao Morimoto', written over a horizontal line.

Isao Morimoto
President and CEO
IJ America, Inc.