

FILED VIA ECFS

February 6, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Certification of CPNI Filing of Nextel Partners, Inc.; EB-06-TC-060
EB Docket No. 06-36**

Dear Ms. Dortch,

Attached is a copy of Nextel Partners, Inc.'s CPNI Compliance Certification for the most recent period which includes an accompanying statement explaining how Nextel Partners' operating procedures ensure compliance with Section 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this information, please do not hesitate to contact the undersigned at (314) 787-3505.

Respectfully submitted,



Elizabeth Brown
Assistant General Counsel
Nextel Partners, Inc.

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau
(via e-mail)

CERTIFICATION OF CPNI FILING (FEB. 6, 2006)

NEXTEL PARTNERS, INC. 2005 CPNI Compliance Certification

1. Pursuant to the rules of the Federal Communications Commission ("FCC"),¹ I, **Donald J. Manning, General Counsel, Chief Privacy Officer and Agent** for NEXTEL PARTNERS, INC. ("Nextel Partners"), hereby submit this annual certification regarding Nextel Partners' establishment of operating procedures to ensure compliance with the FCC's rules for the protection of customer proprietary network information ("CPNI"). As required by 47 C.F.R. § 64.2009(e), I make this certification based on my personal knowledge and supervision of Nextel Partners' implementation of operating procedures to ensure CPNI compliance.

2. Nextel Partners has developed a multi-faceted compliance program to safeguard the storage and use of CPNI. Nextel Partners has provided CPNI notices on the Nextel Subscriber Agreement and on Nextel Partners' website to inform customers of Nextel Partners' obligations regarding the use of, disclosure of and access to CPNI. Beginning in 2003 and during 2004, Nextel Partners activated a program to update its systems to safeguard CPNI, control access and allow employees to determine the status of a customer's CPNI approval prior to any use of CPNI that would require customer consent pursuant to the FCC's rules.² Nextel Partners restricted access to its data storage databases and retrieval systems to prevent access of sensitive customer data by employees. Nextel Partners also activated a Security Awareness program to educate employees on accessing and protecting sensitive customer data.

3. Nextel Partners offers a web-based training course to all of its employees to train them as to when they are, and are not, authorized to use CPNI.³ Nextel Partners also has adopted a disciplinary process, which has been incorporated into the Nextel Partners' Partner Handbook, to address any employee mishandling or misuse of confidential information, including CPNI.⁴ Employees who violate Nextel Partners' confidentiality rules are subject to corrective action up to, and including, immediate termination. In addition, every employee is required to execute a confidentiality agreement with Nextel Partners when they begin employment stating, among other things, that the employee will exercise the highest degree of care in safeguarding confidential information, including CPNI, against any and all loss, theft or other inadvertent disclosure and, except as necessary to perform his or her duties for the Company, will not disclose, transfer or in any way divulge, directly or indirectly, any of

¹ See 47 CFR §§ 64.2001 – 64.2009.

² See 47 C.F.R. §§ 64.2007, 64.2008, 64.2009(a).

³ See 47 C.F.R. § 64.2009(b).

⁴ *Id.*

CERTIFICATION OF CPNI FILING (FEB. 6, 2006)

NEXTEL PARTNERS, INC. 2005 CPNI Compliance Certification

this information, under any circumstances or by any means, to any third party without the prior written consent of Nextel Partners.

4. In almost all instances, Nextel Partners engages in only those marketing activities that offer the same category of service (CMRS) that a customer already subscribes to from Nextel Partners.⁵ However, Nextel Partners may engage in marketing activities that offer CPE and/or information services.⁶ These types of marketing activities do not require Nextel Partners' to use, disclose or permit access to CPNI without opt-in or opt-out consent.⁷

5. Nextel Partners has a Marketing Activity Checklist which is used to ensure that sales and marketing personnel obtain supervisory review and approval prior to any proposed use of CPNI in outbound marketing campaigns.⁸ The Marketing Activity Checklist, maintained by Nextel Partners' IT Department for a minimum of one year, includes a description of outbound marketing campaigns, the specific CPNI used in the campaign, and the products and services offered as part of the campaign.⁹ The Marketing Activity Checklist also serves to provide a record of instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI.¹⁰ As it has since 2003, Nextel Partners will continue to review its relationships with third parties, including any joint venture partners and independent contractors, to identify instances where such parties may obtain access to CPNI in circumstances requiring the adoption of confidentiality agreements. Nextel Partners has negotiated or is negotiating confidentiality agreements with such third parties where required by 47 C.F.R. § 2007(b).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, understanding and belief.

⁵ See 47 C.F.R. § 64.2005(a).

⁶ See 47 C.F.R. § 64.2005(b)(1).

⁷ See 47 C.F.R. § 64.2005(a) and § 64.2005(b)(1).

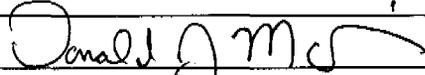
⁸ See 47 C.F.R. §§ 64.2009(c), 64.2009(d).

⁹ *Id.*

¹⁰ *Id.*

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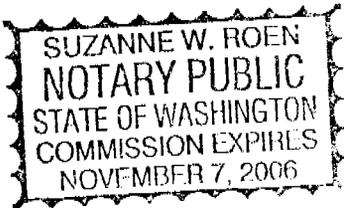
**NEXTEL PARTNERS, INC.
2005 CPNI Compliance Certification**



Donald J. Manning
VP/ General Counsel and
Chief Privacy Officer
NEXTEL PARTNERS, INC.

Executed on 2/6/06

In witness whereof I have hereunto subscribed my name and affixed my official seal this 6th day of February, 2006.




Printed Name: Suzanne W. Roen
NOTARY PUBLIC in and for the State of
Washington

My Commission Expires : 11/7/06