

WORLDNET, L.L.C.
1 Riverfront Plaza, Suite 301
Lawrence, KS 66044

February 6, 2006

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

**Re: WorldNet, L.L.C. Certification of CPNI Filing, February 6, 2006
Docket Numbers 06-258, 06-36 and EB-06-TC-060**

Dear Ms. Dortch;

Pursuant to the Commission's January 30, 2006 and February 2, 2006 Public Notices in DA 06-223 and DA 06-258, we attach the following:

- An officer's compliance certificate as required by Section 64.2009(e) of the Commission's rules;
- A statement explaining how WorldNet, L.L.C.'s operating procedures will ensure compliance with the Commission's CPNI rules.

If you have any questions, please feel free to contact me at (785) 312-6925.

Sincerely,

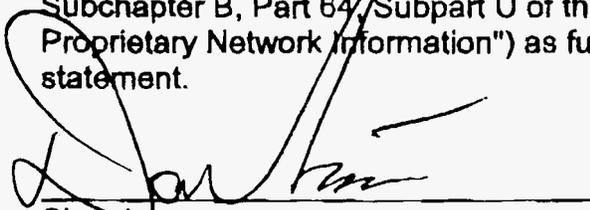
Debra R. Schmidt

Debra R. Schmidt
CPNI Compliance Officer
WorldNet, L.L.C.

Enc: 2

WorldNet, L.L.C. Officer's CPNI Compliance Certification

Pursuant to 47 CFR § 64.2009(e), I, Dan C. Simons, Manager of WorldNet, L.L.C. ("WorldNet"), certify that I have personal knowledge that WorldNet has recently established operating procedures that are adequate to ensure compliance with the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations ("Customer Proprietary Network Information") as further explained in the accompanying statement.



Signature

2-06-06

Date

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Dear Ms. Dortch:

WorldNet, L.L.C. ("WorldNet") provides this statement to explain how its operating procedures ensure compliance with the Commission's rules for Customer Proprietary Information ("CPNI"). To put these procedures in context, WorldNet provides some information about its operations.

WorldNet, L.L.C.

WorldNet is a small CLEC serving approximately 12,000 subscribers in and around Lawrence, Kansas. WorldNet provides local and long distance services to these subscribers. WorldNet's services are marketed under the brand Sunflower Telephone Services. WorldNet's affiliate, Sunflower Broadband, bundles WorldNet's services with Sunflower Broadband's cable television and cable modem services in order to provide subscribers with "triple play" communications services.

As a small and relatively new CLEC (WorldNet only began providing services to the public in August 2001), WorldNet has very limited administrative resources. Accordingly, the company only recently put CPNI operating procedures in place, after retaining regulatory counsel to assist it with compliance with the FCC's CPNI rules. That said, WorldNet has never sold, provided, or shared any CPNI with a third party other than its affiliate, Sunflower Broadband, except where served a court order to do so. In addition, it has been WorldNet's practice to inform all employees that CPNI is confidential information and is not to be shared without customer consent.

WorldNet's CPNI Operating Procedures

WorldNet's written CPNI operating procedures ensure that WorldNet will be in compliance with the Commission's CPNI rules on a going-forward basis, and include the following requirements:

- WorldNet's CPNI Compliance Officer must ensure that CPNI is kept confidential, except for such use, disclosure and access to CPNI as is

permitted by 47 USC § 222, the FCC's CPNI rules (47 CFR §§ 64.2001 – 64.2009), and WorldNet's written *CPNI Compliance Guide and Policies*.

- WorldNet's CPNI Compliance Officer must ensure that the billing system records for each subscriber's account allow the status of the customer's CPNI approval to be easily ascertained.
- WorldNet's CPNI Compliance Officer must ensure that all customer services representatives and marketing personnel are trained as to when they are and are not authorized to use CPNI.
- WorldNet's CPNI Compliance Officer must approve any proposed outbound marketing request for customer approval, and must maintain records of this compliance.
- WorldNet's CPNI Compliance Officer is required to enforce WorldNet's written disciplinary process for misuse of CPNI.
- WorldNet's CPNI Compliance Officer is required to maintain records of all sales and marketing campaigns using WorldNet's subscribers' CPNI, and all disclosures of or access to CPNI by third parties.
- WorldNet's CPNI Compliance Officer is required to maintain records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The records must include:
 - A description of each campaign;
 - The specific CPNI used in each campaign; and
 - The products or services offered as part of the campaign.
- WorldNet's CPNI Compliance Officer is required to have an officer sign an annual compliance certificate under 47 CFR § 64.2009(e), and to include with the compliance certificate a statement explaining how WorldNet's operating procedures ensure that WorldNet is in compliance with the FCC's CPNI rules.
- WorldNet's CPNI Compliance Officer is required to provide written notice to the Commission if there is a non-anomaly instance where the opt-out mechanisms do not work properly
- WorldNet's CPNI Compliance Officer is required to maintain all CPNI-related records for at least a year.
- WorldNet's CPNI Compliance Officer is required to issue notifications to subscribers in accordance with the Commission's CPNI rules if WorldNet seeks subscriber approval for use of CPNI.

In addition, WorldNet's operating procedures include a written disciplinary policy for violations of the CPNI procedures, and a written policy explaining when customer service representatives and sales and marketing personnel can and cannot use CPNI. WorldNet also has a written CPNI policy for dissemination to its subscribers, and a model telephone script to be used for soliciting approval from subscribers for use of their CPNI.

If you have any questions, please feel free to contact me at (785)312-6925.

Sincerely,

A handwritten signature in cursive script that reads "Debra R. Schmidt".

Debra R. Schmidt
CPNI Compliance Officer
WorldNet, L.L.C.