

February 3, 2005

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Certification of CPNI Filing  
EB Docket Nos. 06-TC-060 and 06-36

Dear Ms. Dortch:

Enclosed, in accordance with the Federal Communications Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our customer proprietary network information ("CPNI") compliance certificate and accompanying statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Damon Silva".

Damon Silva

Vice President

No. of Copies rec'd 0  
List ABOVE

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FEB - 9 2006  
FCC - MAILROOM

**CPNI Compliance Certification**

I hereby certify, as an officer of **Cumulous Communications Corporation**, that I have personal knowledge that, to the extent required by the rules and regulations of the Federal Communications Commission, **Cumulous Communications Corporation** has established operating procedures that are adequate to ensure compliance with the rules in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Attached to this Compliance Certification is a statement explaining how **Cumulous Communications Corporation** operating procedures ensure that it is in compliance with these rules.

Name:

*[Signature]*

Title:

*Vice President*

Date:

*02/03/06*

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## STATEMENT

Pursuant to Section 64.2009 of the Federal Communications Commission's ("FCC's") rules and regulations, 47 C.F.R. § 64.2009, **Cumulous Communications Corporation** has prepared this statement outlining why its operating procedures ensure that it is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

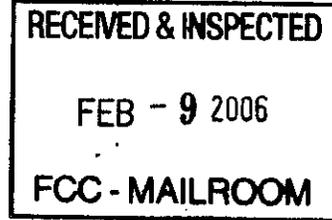
**Cumulous Communications Corporation** does not disclose CPNI to any third parties or allow third party access to CPNI. Nor does **Cumulous Communications Corporation** engage in outbound marketing that utilizes CPNI. **Cumulous Communications Corporation**, however, trains its employees regarding the appropriate use of CPNI and will ensure that any employee that violates established CPNI procedures is appropriately disciplined. In addition, **Cumulous Communications Corporation** will maintain a record of all instances in which CPNI was disclosed or provided to third parties or in which third parties were allowed access to CPNI;

If **Cumulous Communications Corporation** decides to employ CPNI for outbound sales and marketing campaigns, it will:

- maintain a record of sales and marketing campaigns that used customers' CPNI;
- establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintain records of compliance for a minimum period of one year;
- and require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI.

February 3, 2005

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554



Re: Certification of CPNI Filing  
EB Docket Nos. 06-TC-060 and 06-36

Dear Ms. Dortch:

Enclosed, in accordance with the Federal Communications Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our customer proprietary network information ("CPNI") compliance certificate and accompanying statement.

Sincerely,

Damon Silva

Vice President

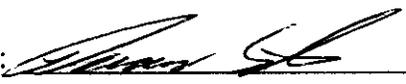
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**CPNI Compliance Certification**

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I hereby certify, as an officer of **Avenal Medical Properties**, ~~that I have personal~~ knowledge that, to the extent required by the rules and regulations of the Federal Communications Commission, **Avenal Medical Properties** has established operating procedures that are adequate to ensure compliance with the rules in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Attached to this Compliance Certification is a statement explaining how **Avenal Medical Properties** operating procedures ensure that it is in compliance with these rules.

Name: 

Title: Vice President

Date: 02-03-06

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## STATEMENT

Pursuant to Section 64.2009 of the Federal Communications Commission's ("FCC's") rules and regulations, 47 C.F.R. § 64.2009, **Avenal Medical Properties** has prepared this statement outlining why its operating procedures ensure that it is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

**Avenal Medical Properties** does not disclose CPNI to any third parties or allow third party access to CPNI. Nor does **Avenal Medical Properties** engage in outbound marketing that utilizes CPNI. **Avenal Medical Properties**, however, trains its employees regarding the appropriate use of CPNI and will ensure that any employee that violates established CPNI procedures is appropriately disciplined. In addition, **Avenal Medical Properties** will maintain a record of all instances in which CPNI was disclosed or provided to third parties or in which third parties were allowed access to CPNI;

If **Avenal Medical Properties** decides to employ CPNI for outbound sales and marketing campaigns, it will:

- maintain a record of sales and marketing campaigns that used customers' CPNI;
- establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintain records of compliance for a minimum period of one year;
- and require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval regarding CPNI.