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February 3, 2006

**VIA PRIORITY FEDERAL EXPRESS DELIVERY**

Attn: Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, Maryland 20743

Re: **CERTIFICATION OF CPNI FILING - FEBRUARY 3, 2006**
**Network Enhanced Technologies, Inc.**
**WC Docket No. 05-196**
**Reference: EB-06-TC-060**

Dear Ms. Dortch:

Pursuant to WC Docket No. 05-196, please accept Network Enhanced Technologies, Inc.'s original letter and four (4) copies attached as submittal of their CPNI Compliance Certification.

A copy of this Compliance Letter is also being sent to Mr. Byron McCoy, Telecommunications Consumers Division; Ms. Janice Wise, Director, Media Relations, Enforcement Bureau; Ms. Donna Cyrus, Telecommunications Consumers Division, Enforcement Bureau; Ms. Rosemary Cabral, Telecommunications Consumers Division, Enforcement Bureau; and Best Copy and Printing, Inc., Commission's copy contract via e-mail on February 3, 2006 pursuant to the FCC's Enforcement Bureau January 30, 2006 Order.

I have also enclosed an extra copy of this letter to be time stamped and returned to me in the enclosed, pre-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with additional information, please contact me at the above address, telephone number or e-mail. Thank you for your attention to this matter.

Respectfully submitted,

Lance J.M. Steinhart
Attorney for Network Enhanced Technologies, Inc.

Enclosures
cc: Mr. Mohammad Kamrava

Mr. Byron McCoy (via e-mail to: byron.mccoy@fcc.gov)
Telecommunications Consumers Division, Enforcement Bureau

Ms. Janice Wise (via e-mail to: Janice.Wise@fcc.gov)
Director, Media Relations, Enforcement Bureau

Ms. Donna Cyrus (via e-mail to: Donna.Cyrus@fcc.gov)
Telecommunications Consumers Division, Enforcement Bureau

Ms. Rosemary Cabral (via e-mail to: Rosemary.Cabral@fcc.gov)
Telecommunications Consumers Division, Enforcement Bureau

Best Copy and Printing, Inc. (via e-mail to: fcc@bcpiweb.com)
Commission Copy Contractor

N•E•T
A Telecommunications Co.
www.netinternet.net

# CERTIFICATION OF CPNI FILING - February 3, 2006

WC Docket No. 05-196
Reference: EB-06-TC-060

I, Mohammad Kamrava, President of Network Enhanced Technologies, Inc. do hereby certify that Network Enhanced Technologies, Inc. is fully compliant with the FCC's CPNI rules 47 CFR Section 64.2009 and EB-06-TC-060. I have personal knowledge that the procedures we have adopted are adequate to ensure compliance with the FCC rules. To market service outside the customer's existing service relationship, we obtain customer approval by using the "Opt-Out" Method. Our operating procedures follow the rules for the "Opt-Out" Method. The customer notification provides sufficient information to enable the customer to make an informed decision.

Date: Feb. 03, 06

Name: Mohammad Kamrava
Title: President

**STATEMENT**

The operating procedures of the Company are designed to ensure compliance with the CPNI rules applicable to them. Such procedures are as follows.

**CPNI Use**

(1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.

*700 S. Flower St., Suite 420 • Los Angeles, CA 90017 • Tel: 213.316.0400 • Fax: 213.622.3219*

(2) We use, disclose or permit access to CPNI to provide or market service offerings among the categories of service – local and interexchange -- to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we do not share the customer's CPNI with an affiliate without the Customer's approval.

(3) We use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval.

(4) Without Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

(5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

**CPNI Approvals**

(1) When Customer approval to use, disclose or permit access to Customer CPNI is required, we obtain approval through written, oral or electronic methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We maintain all records of Customer approvals for at least one year.

(2) Subject to "opt-out" approval requirements, we use a Customer's individually identifiable CPNI to market communications-related services to that Customer, and we disclose that CPNI to our affiliates that provide communications-related services. We also allow these to obtain access to such CPNI to market communications-related services.

**CPNI Notice Requirements**

(1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI either before or along with a solicitation of approval, and we maintain records of notification, whether oral, written or electronic, for at least one year. We solicit Customer approvals proximate to when we notify them of their CPNI rights.

(2) Our notifications provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we indicate that any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.

(3) We advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes. However, we may provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

(4) Our notifications are comprehensible and not misleading and, if written, are legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of a notification is in another language, all portions of the notification will be in that language.

(5) We do not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.

(6) For "opt-out" approvals, our notifications satisfy (1) – (5). We do not use oral notifications except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether we use "opt-out" or "opt-in" approval based on the nature of the contact. When we use oral notice in this manner, we comply with (1) – (5), except that, if none of the following situations are relevant to the limited use for which we seek CPNI, we will not: (a) advise Customers, if they have opted out previously, that no action is needed to maintain the "opt-out" election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party; (c) disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to one-time use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.

(7) In addition, for "opt-out" approvals, we wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and notify Customers of the applicable waiting period for a response before approval is assumed. For electronic notifications, we recognize that the waiting period begins to run on the date the notification is sent and, for mail notifications, it begins to run on the third day following the date the notification was mailed. For e-mail opt-out notices, in addition to other requirements, we: (a) obtain express, verifiable, prior approval to send notices by e-mail regarding their service in general or their CPNI in particular; (b) allow Customers to reply directly to e-mails in order to opt-out; (c) use another means of communicating the notice if the e-mail is returned as undeliverable before considering the Customer to have received notice; and (d) ensure that the subject line in the e-mail clearly and accurately identifies the subject matter of the e-mail.

(8) In addition, for "opt-out" approvals, we provide notices to our customers every two years, and we make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

**CPNI Safeguards**

(1) We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.

(2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place.

(3) We maintain a record of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI, and we maintain a record of all instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We retain these records for at least one year.

(4) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and we maintain compliance records for at least one year. Specifically, our sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.

(5) We have a corporate officer who acts as agent for the Company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. We provide a Statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.

(6) We provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. That notice is in the form of a letter and includes the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether relevant state commission(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. We submit the notice even if other methods by which consumers may opt-out are offered.