

## Business Discount Plan, Inc.

Via Electronic ECFS Filing

February 1, 2007

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Washington, DC 20554

RE: Certification of CPNI Filing (February 1, 2007), EB-06-TC-060

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules<sup>2</sup> and the Commission's *Public Notice*, DA 06-233, dated January 30, 2006, Business Discount Plan, Inc. ("BDP") hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that BDP has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

BDP has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in providing service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure agreements.

CPNI data is accessible only to those with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. BDP has no affiliates. Contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require approval my approval. I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

Business Discount Plan, Inc.



Craig Konrad  
President

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<sup>2</sup> 47 C.F.R. §64.2009(e).

COMPLIANCE CERTIFICATE

State of California )  
 ) ss.  
County of Orange )

I, Craig Konrad, do hereby state that I am President of Business Discount Plan, Inc. and am authorized to make this certification on behalf of Business Discount Plan, Inc..

Under the penalties of perjury, I hereby aver that I have personal knowledge that Business Discount Plan, Inc. has established operating procedures that are adequate to ensure compliance – and that the Company complies - with the Federal Communications Commission’s rules governing protection of Customer Proprietary Network Information pursuant to Section 64.2009, 47 C.F.R. §64.2009.

Dated this 1<sup>st</sup> day of February, 2007.

Business Discount Plan, Inc.

By:



Craig Konrad  
President  
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