

# LUKAS, NACE, GUTIERREZ & SACHS

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February 25, 2008

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

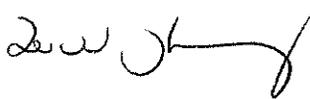
Re: **EB Docket No. 06-36**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith, on behalf of Edge Mobile, LLC, the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Todd Slamowitz

Enclosures

cc: Enforcement Bureau, FCC (2)  
Best Copy and Printing, Inc. (1)



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Re: **Annual 47 C.F.R. § 64.2009(c) CPNI Certification for 2007**  
**EB Docket No. 06-36**

Carrier: Edge Mobile, LLC  
Form 499 Filer ID: 826520

CERTIFICATION

I, Wayne Perry, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company will establish operating procedures effective upon commencement of service to subscribers that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.<sup>1</sup>

Attached to this certification is an accompanying statement explaining how the company's procedures will ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the rules.

  
Name: Wayne Perry  
Title: Managing Member  
Date: 2/20/08

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<sup>1</sup> The Company did not provide commercial service to subscribers during the calendar year 2007. It also does not currently provide commercial service to subscribers. Nonetheless, out of an abundance of caution and at direction of Commission staff, it is hereby filing a CPNI certification to indicate that it will have CPNI procedures upon commencement of commercial service to subscribers.



Company Name ("Carrier"): Edge Mobile, LLC

Address: 650 SW Columbia, Suite 7200  
Bend, OR 97702

### STATEMENT

Carrier will establish operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier will implement a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier will continually educate and train its employees regarding the appropriate use of CPNI. Carrier will establish disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier will maintain a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier will also maintain a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier will establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel will obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process that will ensure that opt-out elections are recorded and followed.