



## The CommLaw Group

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February 28, 2008

### VIA ECFS TRANSMISSION

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

*Re: Oblio Telecom, Inc.  
Annual 47 C.F.R. §64.2009(e) Certification  
EB Docket No. 06-36*

Dear Ms. Dortch:

Pursuant to *Public Notice DA08-171* (January 29, 2008), enclosed herewith for filing with the Federal Communications Commission in the above-referenced docket is the Annual §64.2009(e) CPNI Certification and supporting statement of Oblio Telecom, Inc.

To the extent you have any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

Jonathan S. Marashlian  
Attorney for Oblio Telecom, Inc.



Enclosure

**Annual 47 C.F.R. §64.2009(e) CPNI Certification  
For 2008**

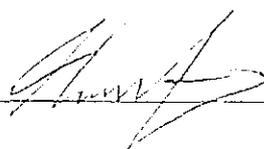
Date Filed: February 28, 2008  
Name of Company Covered by this Certification: Oblio Telecom, Inc.  
Form 499 Filer ID: 825547  
Name of Signatory: Kurt Jensen  
Title of Signatory: CEO

I, Kurt Jensen, certify that I am an officer of the company named above and acting as an agent of the above-named company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. §64.2001 *et seq.*

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

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company has no information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized use of CPNI.

Signed:  \_\_\_\_\_

## STATEMENT OF COMPLIANCE MEASURES

Set forth below is a statement summarizing the Company's policies and procedures which ensure adequate compliance with the FCC's CPNI regulations. *See* 47 C.F.R. §64.2001 *et seq.*

The Company provides telecommunications services exclusively on a prepaid basis. As a prepaid services provider, the Company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of the Company in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the Company's services. These customers do not receive bills from the Company and the Company does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the Company's prepaid services may lawfully be utilized by any authorized user of the purchaser, the Company has no means of identifying the particular individual which has placed any particular call.

Nevertheless, the Company has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the Company has distributed a CPNI compliance policy to all of its employees. The Company does not release or distribute CPNI to unauthorized individuals; neither does the Company use CPNI in violation of Section 64.2001 *et seq.* of the FCC's Rules.

To the extent Call Detail Records (CDRs) exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by the Company in a secure location which is not accessible by employees of the Company without going through the Company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, the Company does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, the Company takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

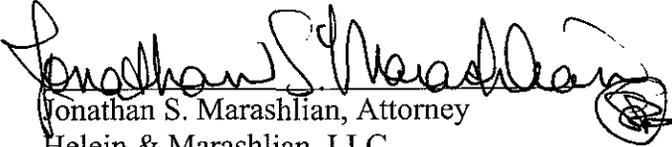
**CERTIFICATE OF SERVICE**

I, Jonathan S. Marashlian, hereby certify that on this 28<sup>th</sup> day of February, 2008, I have caused the foregoing Annual §64.2009(e) CPNI Certification and supporting statement of Oblio Telecom, Inc. to be filed in EB Docket No. 06-36 via the FCC's Electronic Comments Filing System. On the same date, true and correct copies of this document were also served via electronic mail on the following:

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