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February 29, 2008  
**Via ECFS**

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

**RE: EB Docket No. 06-36  
2007 CPNI Certification Filing  
WQN, Inc. - Form 499 Filer ID 826768**

Dear Ms. Dortch:

Enclosed for filing is the 2007 CPNI Compliance Certification submitted on behalf of WQN, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 08-171 issued January 29, 2008.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to  
WQN, Inc.

Attachments

*MB/sp*

cc: FCC Enforcement Bureau (provided via ECFS)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
S. Ivester – WQN  
file: WQN - CPNI  
tms: FCCx0801

Annual 64.2009(e) CPNI Certification for: Calendar Year 2007  
Date Filed: February 29, 2008  
Name of Company covered by this certification: WQN, Inc.  
Form 499 Filer ID: 826768  
Name of Signatory: Steven Ivester  
Title of Signatory: President

I, Steven Ivester, certify and state that:

1. I am the President of WQN, Inc. and, acting as an agent of the company, I have personal knowledge of the WQN, Inc. operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, WQN, Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR, Subpart U.
3. Attached to this certification as Exhibit A 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.



Steven Ivester, President  
WQN, Inc.

02/29/08  
Date

Attachment A  
Statement of CPNI Procedures and Compliance

**WQN, Inc.**

Calendar Year 2007

## **WQN, Inc.**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

WQN, Inc. (“WQN” or “Company”) provides local exchange and long distance services via traditional wireline and Voice over Internet Protocol (VoIP) services to residential and business customers. The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If WQN elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

WQN bills its customers directly and has taken steps to secure CPNI and call detail records, and manage the release of such information in accordance with FCC rules. The company has put into place processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

Call detail information is provided over the telephone to customers once the customer provides a 4-digit PIN to the Company’s Service Representative. If the customer cannot provide the password and the customer’s question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by calling the customer at the telephone number of record.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

WQN is not yet subject to the on-line requirement and will be in full compliance including authentication procedures to safeguard the disclosure of CPNI, establishment back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical or account information, by June 8, 2008.

**WQN, Inc.**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

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The Company does not have retail locations and therefore does not disclose CPNI in-store.

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information) , password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not taken any actions against data brokers in the last year.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.