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March 3, 2008
Via ECFS Transmission

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

RE: **National Brands, Inc. d/b/a Sharenet Communcations Company**
2007 CPNI Certification Filing EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of National Brands, Inc. d/b/a Sharenet Communications Company., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3002 or via email to cwightman@tminc.com.

Sincerely,

Connie Wightman
Consultant

cc: Best Copy and Printing - (FCC@BCPIWEB.COM)
FCC Enforcement Bureau (provided via ECFS website)
Gary Joseph, Sharenet
file: NTBR - FCC
tms: FCCx0801

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year:	2007
Name of company covered by this certification:	National Brands, Inc. d/b/a Sharenet Communications Company
Form 499 Filer ID:	803190
Name of signatory:	Gary Joseph
Title of signatory:	Vice President

I, Gary Joseph, certify and state that:

1. I am the Vice President of National Brands, Inc. d/b/a Sharenet Communications Company ("Sharenet") and, acting as an agent of the company, I have personal knowledge of 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, Sharenet'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.

Gary Joseph

Gary Joseph, Vice President
National Brands, Inc. d/b/a Sharenet Communications Company

MARCH 03, 2008
Date

Exhibit A
Statement of CPNI Procedures and Compliance

Exhibit A
National Brands, Inc. d/b/a Sharenet Communications Company
Customer Proprietary Network Information Policy
Updated December 2007

Overview

Sharenet Communications Company adopts this policy to help Sharenet work with our customers to make appropriate use of customer information acquired through various means. The objective of this policy is to comply with applicable laws and regulations for balancing consumer concerns about privacy with their interest in receiving high quality service and useful new products.

Sharenet is guided in the creation and enforcement of this policy by the following principals: Sharenet customers have the right to receive relevant information about their services and Sharenet respects its customer's privacy.

Collection and Use of Customer Proprietary Network Information

Sharenet collects and uses individual customer information for its business purposes only. Sharenet informs its customers as to how the information they collect will be used and of their options as to its use. Sharenet allows the customer to choose whether individual information can be used to sell them additional products or services.

Sharenet attempts to insure the accuracy of information collected from individual customers and their instructions as to its use. Sharenet only discloses individual information about an individual customer to other entities or persons only as required by law or to protect the safety of customers, employees or property.

Sharenet takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI and authenticates customers before disclosing CPNI in response to a telephone call. The Company does not provide online or in-store services, therefore Sharenet does not establish a password for this use. If the Company chooses to do so at a later date, it will take the necessary steps to insure customer information is protected via passwords.
All Sharenet employees are responsible for safeguarding individual customer communications and information. Specifically:

- Sharenet Employees and agents may not (or permit other to) access, listen to, monitor, record, tamper with or intrude upon any customer conversation or non-voice communication, or divulge their existence, except in response to a verified service or installation order, or to comply with a valid legal law or order.

- Sharenet Employees and agents must not use, access, or disclose customer information – including information concerning the customer's friends, acquaintances, family or coworkers except as authorized by law or specifically by the customer.
- Sharenet Employees must not disclose call detail information over the telephone or in-person except in compliance with FCC rules.

- Sharenet Employees and agents must ensure that vendors and contractors protect customer information as described above.

- Sharenet Employees and agents who are aware of or suspect a breach of this policy are to notify an officer of Sharenet immediately.

- Before using any individual customer information to market additional products or services, or before disclosing individual customer information to other companies for marketing purposes, Sharenet employees must follow all company policies and applicable laws and regulations regarding the use and disclosure of this information.

Compliance with Laws and Regulations

Sharenet supports industry and consumer efforts to identify and protect privacy issues. Sharenet complies with all applicable privacy laws and regulations in its operating areas.

Sharenet also requires its vendors, consultants, suppliers and contractors to comply with this Customer Proprietary Information Policy.

Sharenet will cooperate with government investigations and inquiries relating to Sharenet, while at the same time being sensibly protective of individual customer information to the extent allowed.

Sharenet will notify law enforcement of a breach of its customers' CPNI and delays customer notification until it has completed the process of notifying law enforcement as required by FCC rules.

Sharenet tracks customer complaints received concerning the unauthorized release of CPNI.

Use of customer proprietary network information without customer approval.

Sharenet may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (i.e., local, interexchange, DSL, internet access and CMRS) to which the customer already subscribes from the same carrier, without customer approval.

Sharenet may use CPNI of its local customers, without customer approval, to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, voice mail, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features. Sharenet may use, disclose, or permit access to CPNI to protect the rights or property of Sharenet, or to protect users of those services and other Sharenet from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Sharenet may not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from Sharenet, unless Sharenet has customer approval to do so, except in its

provision of inside wiring installation, maintenance, and repair services or for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

Sharenet may not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

Approval required for use of customer proprietary network information.

Sharenet may obtain customer approval through written or electronic methods. Sharenet will maintain records of approval, whether written or electronic, for at least one year.

Opt In Provisions

Except as identified above, Sharenet will not use, disclose, or permit access to its customer's CPNI unless the customer has given opt-in approval. Sharenet may, subject to opt-in approval, disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents; its affiliates that provide communications-related services; and its joint venture partners and independent contractors. Sharenet may also permit such persons or entities to obtain access to such CPNI for such purposes. Sharenet does not use, disclose, or permit access to its customer's CPNI based on opt-out approval.

Customer Notice

Prior to any solicitation for customer approval, Sharenet provides notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. Sharenet will maintain records of notification, whether written or electronic, for at least one year. Individual notice to customers will be provided when soliciting approval to use, disclose, or permit access to customers' CPNI. Such notice will provide sufficient information to enable the customer to make an informed decision as to whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI.

The notification will state that the customer has a right, and Sharenet has a duty, under federal law, to protect the confidentiality of CPNI. The notification will specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time. The notification will also advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and will clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, Sharenet may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI. The notification will be comprehensible and will not be misleading.

If written notification is provided, the notice will be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer. If any portion of a notification is translated into another language, then all portions of the notification must be translated into that language.

Sharenet may state in the notification that the customer's approval to use CPNI may enhance Sharenet's ability to offer products and services tailored to the customer's needs. Sharenet may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

Sharenet will not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI. Sharenet's notification will state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

Sharenet's solicitation for approval will be proximate to the notification of a customer's CPNI rights.

Notice Requirements Specific to Opt-In

Sharenet may provide notification to obtain opt-in approval through written, or electronic methods. The contents of any such notification will comply with applicable laws and regulations.

Notice Requirements Specific to One-Time Use of CPNI

Sharenet may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether the or not the customer has previously opted in. The contents of any such notification will depend on the scope of the limited use for which Sharenet seeks CPNI: Sharenet need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election. Sharenet need not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party; Sharenet need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as Sharenet explain to customers that the scope of the approval Sharenet seeks is limited to one-time use; and Sharenet may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Sharenet clearly communicates that the customer can deny access to his CPNI for the call.

Safeguards required for use of customer proprietary network information

Before Sharenet uses CPNI, it will implement a system by which the status of a customer's CPNI approval can be clearly established.

Sharenet will train their personnel as to when they are and are not authorized to use CPNI, and Sharenet will have an express disciplinary process in place.

Sharenet will maintain a record for a minimum of one year, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use their customers' CPNI. Sharenet will 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 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.

Sharenet will establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Sharenet will have an officer, as an agent of Sharenet, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. Sharenet will provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with applicable regulations. In addition, Sharenet will include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing will be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

Protections Against Unauthorized Disclosure of CPNI

Sharenet will take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. All customers will be properly authenticated before Sharenet will disclose CPNI in response to a telephone call.
Sharenet will only disclose call detail information over the telephone in response to a customer-initiated contact if Sharenet can authenticate the identity of the caller. Sharenett does not not prompt the caller by asking for readily available account information or available biographical information. If the customer is not known to the Sharenet contact, , Sharenet will only disclose call detail by sending it to the customer's address of record, or by calling the authorized customer at the telephone number of record. If the customer can provide call detail information to Sharenet during a customer-initiated call without Sharenet's assistance, then Sharenet is permitted to discuss the call detail information provided by the customer.

Sharenet may bind itself contractually to authentication regimes other than those described above for services that Sharenet provides to business customers that have both a dedicated account representative and a contract that specifically addresses Sharenet's protection of CPNI.

Notification of security breaches

Sharenet will notify law enforcement of a breach of its customers' CPNI as provided below. Sharenet will not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement described below.

As soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, Sharenet will electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through a central reporting facility. Notwithstanding any state law to the contrary, Sharenet will not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided below.

If Sharenet believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed, in order to avoid immediate and irreparable harm, Sharenet will so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. Sharenet will cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct Sharenet not to so disclose or notify for an initial period of up to 30 days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency. If such direction is given, the agency shall notify Sharenet when it appears that public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to Sharenet, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writings shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by carriers.

After Sharenet has completed the process of notifying law enforcement it will notify its customers of a breach of those customers' CPNI.

Sharenet will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. Sharenet will retain the record for a minimum of 2 years.