

Telefonica

March 28, 2008

Attention: Enforcement Bureau: EB Docket No.06-36
Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

Received & Inspected

APR 29 2008

FCC Mail Room

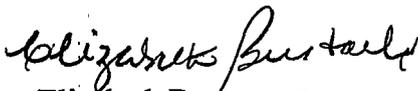
RE: Telefonica USA, Inc.: CPNI Certification

Dear Sir/Madam;

On behalf of Telefonica USA, Inc., a telecommunications service provider and/or Interconnected VoIP provider, please find enclosed the annual CPNI Certification as required on the Report and Order In the Matter of Implementation of the Telecommunications Act of 1996, Telecommunications Carriers Use of CPNI and Other Customer Information, CC Docket 96-115.

Should you have any questions, please direct them to me at the contact number and address set forth below.

Sincerely,



Elizabeth Bustamante
Contracts Manager
1111 Brickell Avenue
Suite 1000
Miami, FL 33131
Phone: 1-305-925-5259 – e-mail: ebustamante@us.telefonica.com

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

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Annual 64.2009(e) CPNI Certification for 2007

Date filed: **April 28, 2008**

Name of companies covered by this certification:
Telefonica USA, Inc.

Form 499 Filer ID: **824684**

Name of signatory: **Victor Hugo Navarro**

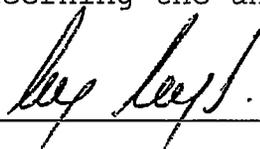
Title of signatory: **Chief Financial Officer**

I, Victor Navarro, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules. See 47 C.F.R. § 64.2001 et seq.

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

The companies have not taken any actions against data brokers in the year 2007.

The companies have not received any customer complaints in the year 2007 concerning the unauthorized release of CPNI.

Signed 

Telefonica

Telefonica USA, Inc.'s Statement of Compliance with CPNI Rules in 2007

Telefonica USA, Inc. ("TUSA") is a telecommunications carrier as defined in section 3(44) of the Communications Act of 1934, as amended, 47 USCS § 153(44). **TUSA** only uses, discloses, or permits access a to *customer proprietary network information* ("CPNI"), in a manner consistent with the provisions set forth by the Federal Communications Commission in its CPNI Rules, 47 C.F.R. § 64.2001 et seq ("CPNI Rules"). **TUSA** does not use CPNI for marketing service offerings, does not share CPNI with its affiliates, and does not use CPNI to identify or track customers that call competing service providers.

TUSA does not share CPNI with data brokers. **TUSA** only shares CPNI information with third parties contracted by **TUSA** for the limited purpose of providing customer service support, to properly authenticate customer's identity, or to validate customer's consent to any changes in service offerings, all in a manner consistent with the CPNI Rules.

Regarding safeguards on the disclosure of CPNI, prior to start working at **TUSA**, all new hires execute a Confidentiality Agreement, pursuant to which employees are precluded from accessing and using CPNI in a manner inconsistent with the CPNI Rules. A representative of **TUSA's** Human Resources ensures that these documents are completed and filled out correctly prior to employee starting work. Original documents are filed in Employee's employment file. Should a violation of the Confidentiality Agreement occur, **TUSA** will take necessary measures to investigate such violation and take appropriate disciplinary action in accordance with the company policies.

CERTIFICATION

I, Victor Navarro, Chief Financial Officer of **Telefonica USA, Inc.**, ("**TUSA**"), duly authorized to submit this Certification on behalf of **TUSA**, hereby declare under penalty of perjury that to the best of my knowledge, information and belief the foregoing is true and correct.



Signature

04/29/2008

Date