

Jennifer M. Kashatus  
Attorney  
Direct Dial: (202) 857-4506  
Direct Fax: (202) 261-0006  
E-mail: JKashatus@wcsr.com

May 15, 2008

Via ECFS

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Re-Filing CPNI Certification, EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Super Net, Inc. ("Super Net" or the "Company"), attached please find the Company's re-filed Customer Proprietary Network Information Certification ("CPNI Certification").

Super Net executed the CPNI Certification on February 11, 2008. As stated in the attached declaration, Super Net believed that it filed the same via the Commission's Electronic Comments Filing System in the above-referenced docket on February 11, 2008. Super Net subsequently determined, however, that its CPNI Certification is not listed as filed in EB Docket No. 06-36. Therefore, out of an abundance of caution, Super Net is re-filing its CPNI Certification at this time.

Please contact me at (202) 857-4506 if you have any questions regarding this filing.

Respectfully submitted,

**WOMBLE CARLYLE SANDRIDGE & RICE**  
*A Professional Limited Liability Company*

*Jennifer M. Kashatus (JKM)*  
Jennifer M. Kashatus

cc: Marcy Greene (via email)  
Best Copy & Printing (via email)

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**EB Docket No. 06-36**

**DECLARATION OF ROBERT GESSNER**

I, Robert Gessner, am over 18 years of age, hereby declare:

1. My name is Robert Gessner. I am the President of Super Net, Inc. ("Super Net" or the "Company"), a provider of digital voice services.
2. On February 11, 2008, I executed a Customer Proprietary Network Information ("CPNI") certification on behalf of Super Net ("CPNI Certification").
3. I recall submitting the CPNI Certification to the Commission via the Electronic Comment Filing System on February 11, 2008, in advance of the Commission's March 1 filing deadline.
4. I subsequently conducted a search in ECFS under Docket No. 06-36, and I discovered that the Company's submission does not appear in that docket. Nor did I otherwise see the Company's filing on ECFS.
5. To ensure that the Commission indeed has received the Company's CPNI Certification, I am re-filing the certification in EB Docket No. 06-36.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 16<sup>th</sup> May, 2008.

  
Robert Gessner  
President  
Super Net, Inc.

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 11, 2008

Name of company covered by this certification: Super Net, Inc.

Form 499 Filer ID: 826133

Name of signatory: Robert Gessner

Title of signatory: President

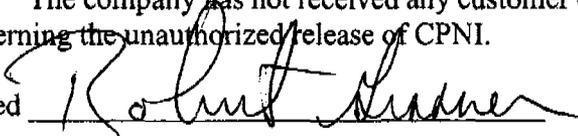
I, Robert Gessner, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et 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 systems, or at the Commission against data brokers) against data brokers in the past year.

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

Signed

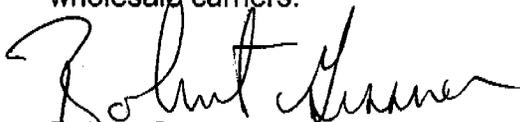
A handwritten signature in black ink, appearing to read "Robert Gessner", is written over a horizontal line.

**CPNI Corporate Certification**  
**CPNI Policy Statement**

I, Robert Gessner, President, am a corporate officer of Super Net, Inc. Pursuant to 47 U.S.C. § 222; 47 C.F.R. §64.2009 of the Communications Act, I hereby state that I am responsible for company compliance with the FCC's CPNI rules and have personal knowledge that Super Net, Inc. is in compliance with the rules. Super Net, Inc.'s compliance is demonstrated in this CPNI Policy Statement.

I attest to the following:

1. Our company utilizes an employee training program with a supervisory review process to ensure compliance with CPNI rules and regulations.
2. Our company maintains records of compliance for the minimum period as required by FCC rules and regulations.
3. Our company has a supervisory approval process in place for any proposed outbound marketing request for CPNI.
4. Our company has a notification process in place to alert law enforcement, the FCC and effected customers in the event of a CPNI breach.
5. Our company has a notification process in place for immediate notice to customers when a customer initiated password or back-up for forgotten passwords; an on-line account; or the address of record is created or changed.
6. Our company has a formal process in place to certify that CPNI protection policies have been instituted by our applicable vendors, service bureaus and wholesale carriers.



Robert Gessner

February 11, 2008

## CPNI Checklist

- ✓ Super Net has chosen to prohibit the use of CPNI for marketing purposes between itself and its affiliates, if any.
- ✓ Super Net's Policy Manual(s) has/have been updated to include CPNI.
- ✓ Employees have been trained on the FCC CPNI rules and Super Net's penalties for non-compliance and their signed acknowledgements have been obtained and filed.
- ✓ Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of Super Net's CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed. (CSR Policy must require written customer authorization prior to accessing CSR data as part of the new customer sales procedure).
- ✓ Super Net requires written approval for release of CPNI to third parties.
- ✓ Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request.
- ✓ Super Net has chosen not to use authorized CPNI for marketing.
- ✓ Super Net has provided one-time notification to customers for use of CPNI.
- ✓ A Corporate Officer has been named as the Super Net CPNI Compliance Officer and will certify annually that Super Net, Inc. is in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
- ✓ Safeguards are in place with all third parties having access to Super Net customer data or responsibility for creation of Super Net customer data. All applicable parties have attested to their compliance with FCC CPNI Rules and their attestations are on file.
- ✓ Safeguards are in place to obtain the explicit consent of a customer before disclosing a customer's CPNI to a joint venture partner or independent contractor for the purpose of marketing communications-related services to that customer.