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February 8, 2008

Ms Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commissions  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

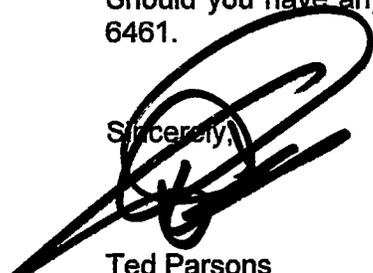
RE: Certification of CPNI Filing (February 2008)

Dear Ms Dortch:

In compliance with the FCC's Public Notice, Xfone USA, Inc. hereby files its report providing its annual CPNI officer certification and accompanying statement in Exhibit A and in the Operating Procedures for Compliance with CPNI Regulations document, explaining how its operating procedures ensure compliance with the FCC's CPNI rule.

Should you have any questions or need additional information, please contact me at 601-420-6461.

Sincerely,



Ted Parsons  
Executive Vice President  
Xfone USA, Inc.

cc: File  
enclosures



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**ANNUAL OFFICER'S CERTIFICATE**

**OF**

**CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

I, Ted Parsons, Affiant, certify, affirm, depose and say that:

I am the Executive Vice President and Secretary of Xfone USA, Inc.;

That I am authorized to and do make this Certification for Xfone USA, Inc.;

That I do have personal knowledge of Xfone USA's CPNI operating procedures, the Rules and Regulations of the Federal Communications Commissions regarding CPNI and that Xfone USA's procedures in place conform and ensure Xfone USA's ongoing compliance with such Rules, including those set forth in 47 C.F.R. 64.2001, et seq.

A further statement outlining the Xfone USA, Inc. procedures that are in place is attached as *Exhibit A*, as required by 47 C.F.R. 64.2009(e).

I confirm that this Certification was effective from January 1, 2007 to December 31, 2007.

A handwritten signature in black ink, appearing to read 'Ted Parsons', written over a horizontal line.

**TED PARSONS  
EXECUTIVE VICE PRESIDENT  
XPHONE USA, INC.**

Dated: 2/8/08



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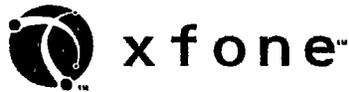
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**Exhibit A**

**Statement of CPNI Procedures and Compliance for 2005**

- Xfone USA, Inc. requires all employees to read and understand the company Employee Handbook and all employees are also required to execute a Confidentiality Agreement, which details confidential procedures which comply with the FCC Rules and Regulations regarding CPNI compliance. The Employee Hand Book and Procedures are updated from time to time, and as required by law.
- Customer Service Records are maintained in the customer contact information in the company's billing system. The Customer Service Rep, on every call that is received into the Customer Support Center, verifies certain portions of this information before proceeding with the call.
  - Customer information includes:
    - Place of Employment
    - Contact Information (Telephone Numbers, e-mail, SSN, etc.)
    - Credit Records
    - Payment History
    - Billing Data for Services Provided
    - Calling Patterns
    - Calling History
  - These records are strictly confidential and are only discussed with the person or persons authorized to make changes on the account(s).
  - Account Numbers, Pass Codes and PIN(s) (Personal Identification Numbers) are required to be presented by a caller making an inquiry on the account or to make changes to the account before any information regarding an account is released.
- Xfone USA maintains records of all sales and marketing campaigns that use Xfone USA's end-user customers' CPNI. The Company maintains a file on every action taken where CPNI is used for marketing purposes, allowing third party access or for internal marketing uses. The file identifies each campaign, the specific CPNI used in each campaign, and the offer of products/services provided. Xfone USA maintains these files for a period of no less than one (1) year.



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**OPERATING PROCEDURES FOR COMPLIANCE  
WITH CPNI REGULATIONS**

Every employee of Xfone USA, Inc. (the "Company") has a duty to protect the confidentiality of customer proprietary information "CPNI" as defined in 47 U.S.C. 222(f). A violation of the Company's operating procedures will result in disciplinary action which may result in immediate dismissal without warning.

The Company provides both local exchange service and long distance telephone service. It is the Company's policy to not use CPNI for any prohibited sales or marketing activity.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena, of which all subpoenas are handled directly through the Company's Regulatory Department and not through undesignated Company employees, or is used for the following purposes: (1) to bill or to collect payment for the Company's services or (2) to protect the rights or property of the Company or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any prohibited marketing purpose.

As a result of the FCC imposing additional requirements to be CPNI compliant, in March 2007 to combat the practice of "pretexting," where an unauthorized third party pretends to be a customer or an unauthorized agent to gain access to a customer's private information, the Company now requires authentication of the identity of any party requesting call detail information prior to releasing that information. This process is in addition to the CPNI authentication process already in place whereby a Company employee discloses information pertaining to the customer's account (outside of call detail information) only upon an affirmative request by the customer and only after validating that the person requesting the information is the person listed in the Company records as the authorized contact for the account. No company employee shall disclose CPNI of any kind to a person other than the authorized contact for the account unless the customer provides written authorization affirmatively requesting that customer's CPNI be disclosed to that person listed in the written authorization.

The Company keeps records of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to any kind of CPNI (hereinafter referred to as "the CPNI record"). The employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reason(s) for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the Company for a minimum period of one (1) year.



**OPERATING PROCEDURES FOR COMPLIANCE  
WITH CPNI REGULATIONS**

All Company employees are required to sign a Confidentiality Agreement which obligates them to protect customer information. Employees are also required to sign a separate CPNI Agreement stating that they will comply with CPNI rules contained in the Company Employee Handbook and as described in the Company Code of Conduct, also included in the Employee Handbook. Employees who regularly handle customer inquiries are subject to live monitoring to ensure compliance and as necessary receive periodic reminders via e-mail or direct instruction from a supervisor or manager.

Should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purposes until after the Company has sent customers notices as required by 47 C.F.R. 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. If the Company changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign, the Company will establish a system which meets the requirements of 47 C.F.R. 64.2009 (c) and (d).