

## CERTIFICATION

I, Rick Derr, hereby certify this 9nd of January, 2009, that I am President and Owner of Action Communications, Inc. and that I have personal knowledge that Action Communications, Inc. has established operating procedures that are adequate to assure compliance with the rules codified at 47 C.F.R. Sections 64.2001-2009 which regulate Customer Proprietary Network Information.

"/s/" Rick Derr  
President  
Action Communications, Inc.