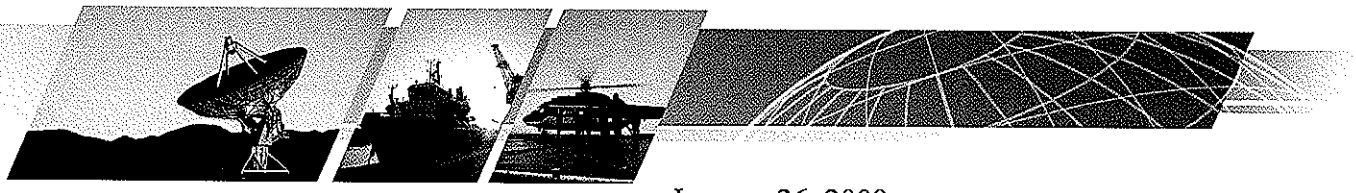

January 26, 2009

BY ELECTRONIC FILING (Docket No. 06-36)

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36; 2008 CPNI Compliance Certification
Stratos Offshore Services Company

Dear Secretary Dortch,

Attached please find the 2008 CPNI Compliance Certification for Stratos Offshore Services Company. Please direct any questions concerning this filing to the undersigned at (301) 968-1938.

Respectfuly submitted,

Bruce Henoch
Vice President, Legal & Regulatory Affairs
And Assistant Secretary

cc: Best Copy and Printing, Inc. (by e-mail)
Marcy Greene, Telecomm. Consumers Div., Enforcement Div., Enforcement Bureau (by e-mail)

STRATOS®

BEYOND THE HORIZON®

Annual 47 C.F.R. §64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: January 26, 2009

Name of Company Covered by This Certification: Stratos Offshore Services Company

Form 499 Filer ID: 812403

Name of Signatory: Bruce A. Henoch

Title of Signatory: Vice President, Legal and Regulatory Affairs And Assistant Secretary

I, Bruce A. Henoch, certify that I am an officer of the company named above ("Stratos"), and acting as an agent of Stratos, that I have personal knowledge that Stratos 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 Stratos' procedures ensure that Stratos is in compliance with the requirements set forth in § 64.2001 *et seq* of the Commission's rules.

Stratos has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Stratos has no information other than that available in the media and from the Commission regarding the processes that pretexters are using to attempt to access CPNI. As described in the accompanying statement, Stratos itself has established practices and procedures to protect CPNI.

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

Bruce A. Henoch
Vice President, Legal and Regulatory Affairs And Assistant Secretary
Stratos Offshore Services Company
Date: January 26, 2009

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Stratos Offshore Services Company ("Stratos") has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 *et seq.*

The responsibility for Stratos' CPNI policies and procedures resides with the company's Vice President, Legal and Regulatory Affairs, who has reviewed Section 222 of the Communications Act and the FCC's CPNI Rules (47 C.F.R. § 64.2001 et seq.) and is familiar with their requirements.

The following operating procedures ensure that Stratos is in compliance with the FCC's CPNI Rules:

1. Stratos does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

2. Stratos only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. Stratos does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 *et seq.*

3. Stratos has established detailed written practices and procedures governing the disclosure of CPNI:

   a. Stratos does not disclose or release CPNI upon a customer's telephone request except under the following circumstances: (1) Stratos verifies the identity of the caller by return call to the telephone number of record in the customer's file; (2) Stratos sends the CPNI to the customer's address of record in the customer's file; or (3) for business customers, through the customer's dedicated account manager.

   b. With respect to telephone inquiries by customers concerning specific call-related issues, Stratos requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.

   c. Stratos automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.

   d. Stratos has implemented procedures to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

4. Stratos provides comprehensive training on these practices and procedures to all relevant employees.

5. Because Stratos does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to do so by customers), it has not implemented either "opt-in" or "opt-out" CPNI approval procedures set forth at Section 64.2007 of the Commission's Rules, 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures set forth at Section 64.2008 of the Commission's Rules, 47 C.F.R. § 64.2008.

6. In the event that Stratos in the future plans to utilize CPNI or provide CPNI to other entities other than as described above, it will first provide customer's notification of their CPNI rights as required by the Commission's Rules. 47 C.F.R. § 64.2008.

7. It is a violation of Stratos' policies to disclose CPNI outside of Stratos. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

8. Access to CPNI at Stratos is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

9. Strict controls are in place involving responses to law enforcement agencies that serve Stratos with valid legal demands, such as a court ordered subpoena, for CPNI. Stratos will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.

These procedures and policies have been specifically approved by Stratos' corporate officers.