



1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

9 February 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
Wireless Telecommunications Bureau
445 12th Street, S.W.
Washington, DC 20554

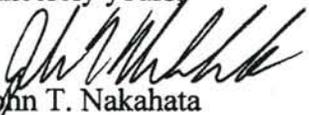
Re: 2008 Annual Customer Proprietary Network (CPNI) Certifications

Dear Ms. Dortch:

In accordance with the Public Notice DA 09-9, issued by the Enforcement Bureau on January 7, 2009, Exelon LLC transmits its CPNI Certification, complying with the rules set forth by the Federal Communications Commission in 47 C.F.R. Section 64.2009(e).

Please feel free to direct any questions to me at (202) 730-1320 or at jnakahata@harriswiltshire.com.

Sincerely yours,


John T. Nakahata
Counsel for Exelon, LLC

cc: Robert Somers

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 6, 2009

Name of company covered by this certification: Exelon, LLC

Form 499 Filer ID: 825571

Name of signatory: Edwin Janaslani

Title of signatory:

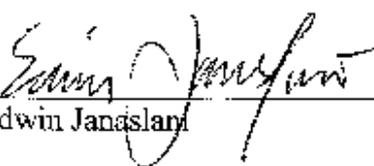
I, Edwin Janaslani, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensured that the company was and 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 the company at state commissions, the court system, or the Commission against data brokers) during the period covered by this certification.

The company has not received any customer complaints during the period covered by this certification concerning the unauthorized release of CPNI.

Signed


Edwin Janaslani

2008 Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Attachment 1: Statement Concerning Company Procedures

Exelon, LLC (Exelon) does not use CPNI for marketing purposes. Exelon sells prepaid telecommunications products over the Internet.

During 2008, Exelon had in place the following mechanisms to ensure that CPNI, including customer call detail information, was safeguarded.

For its products for which it maintained call detail records, all employee access was password protected, and was restricted to specific hours set by company management. Every login session is also recorded to track the activities of each representative. All customer access to those call detail records was password protected. A customer could only gain access to his or her call detail records and other CPNI by providing his or her password, either online or by telephone in a customer-initiated call with an Exelon customer service representative. The customer was required to set the password at the time that the customer established his or her account online with Exelon, and purchased his or her prepaid products, which required use of a credit card. At the time the account was established, the customer must also provide an email address of record, in addition to providing the necessary credit card information (name, card number, billing address). Thus, the customer was necessarily authenticated at the time the password is established. The password was chosen by the customer, and was not prompted by any questions or prompts relating to readily-available biographical information or account information.

In addition, it was Exelon's regular practice to call and speak to the customer on a landline telephone after the customer established an account for the first time. The customer service representative making the call would ask to verify the cross street near the credit card billing address. Exelon also checks the phone number to see if it is located at the billing address, including consulting white pages listings.

In the event that the customer had lost or forgotten his or her password, the customer was permitted to have the password emailed to his or her email address associated with the account, which had to be established at the time the account was established and could only be changed with the password.

A customer was only permitted change his or her password, email address or other account information on-line. When a customer made any change to his or her account information, including creating a new password, changing the email address, or changing billing information, Exelon automatically sent an email notification of the change to the customer's email address of record. In the event of a change of email address, this notification was sent both to the customer's prior email address and its new email address.

Exelon also encrypts all of its call detail records and account information, to protect against access by hackers.

All of Exelon's staff was instructed that they are not to give out call detail information or passwords, except in accordance with the procedures described above. Employees are subject to discipline, including termination, for violations of these policies.