

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 23, 2009

Name of company(s) covered by this certification: China Telecom (Americas) Corporation

Form 499 Filer ID: 822646

Name of signatory: Ling-Ping Kong

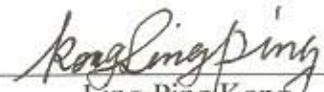
Title of signatory: Vice President

I, Ling-Ping Kong, certify that I am an officer of the China Telecom (Americas) Corporation (the "Company"), 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 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 
Ling-Ping Kong

ATTACHMENT

China Telecom (Americas) Corporation has put in place a program to ensure compliance with the FCC's requirement to protect customer proprietary network information ("CPNI"). This program is supervised by the Director for Administration who is responsible for implementation and approval of all uses of CPNI.

The Director for Administration has established:

- A mechanism for customers to opt-out of receiving marketing information based on their CPNI
- A record-keeping system to determine the customer's decision regarding use of CPNI, any marketing and sales campaign using CPNI and all instances of when CPNI was disclosed or provided to third parties
- A disciplinary procedure for improper use of CPNI by employees, agents and contractors
- A training mechanism to ensure that all employees, agents and contractors are aware of when they can use CPNI in sales and marketing
- A standard contract provision for enterprise customers regarding use of CPNI