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Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

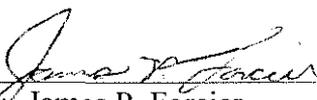
Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008**  
**EB Docket No. 06-36**

Form 499 Filer ID: 820896

CERTIFICATION

I, James P. Forcier, hereby certify that I am an officer of Westelcom Networks, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2008 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

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 rules.

  
\_\_\_\_\_  
Name: James P. Forcier  
Title: President  
Date: February, 23, 2009



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Westelcom Networks, Inc.

Address: 2 Champlain Ave  
Westport, NY 12993

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## STATEMENT

Westelcom Networks, Inc. has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Westelcom Networks, Inc. has implemented procedures whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Westelcom Networks, Inc. continually educates and trains its employees regarding the appropriate use of CPNI. Westelcom Networks, Inc. has established disciplinary procedures should an employee violate the CPNI procedures established by Westelcom Networks, Inc.
- Westelcom Networks, Inc. maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Westelcom Networks, Inc. also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Westelcom Networks, Inc. has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Westelcom Networks, Inc. compliance for a minimum period of one year. Specifically, Westelcom Networks, Inc.'s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.



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- Westelcom Networks, Inc. took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Westelcom Networks, Inc. at a state commission, in the court system, or at the Federal Communications Commission: No Actions needed against Data Brokers in 2008.
- Westelcom Networks, Inc. takes the following steps to protect against pretexting and to protect CPNI:
  - All customers are authenticated, either by password, back up question or valid Photo ID.
  - If authentication is not possible, the service representative calls the customer back at the telephone number of record, or suggests the customer come into the local business office with a valid photo ID or CPNI information is mailed to the customer at the address of record.
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
  - Number of customer complaints Westelcom Networks, Inc. received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: There were NO complaints in 2008.
  - Category of complaint:
    - \_0\_ Number of instances of improper access by employees
    - \_0\_ Number of instances of improper disclosure to individuals not authorized to receive the information
    - \_0\_ Number of instances of improper access to online information by individuals not authorized to view the information
    - \_0\_ Number of other instances of improper access or disclosure
  - Description of instances of customer complaints, improper access or disclosure: None.