

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

Name of Company: Wireless Calling Concepts, Inc.
Form 499 Filer ID: 825541
Name of Signatory: Andrew Constantin
Title of Signatory: President/ CEO

I, Andrew Constantin, hereby certify that I am an officer of Wireless Calling Concepts, Inc. ("Wireless Calling Concepts") and that I am authorized to make this certification on behalf of Wireless Calling Concepts. I have personal knowledge that Wireless Calling Concepts has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, to the extent that such rules apply to Wireless Calling Concepts or to any of the information obtained by Wireless Calling Concepts. *See 47 C.F.R. §64.2001 et seq.*

Attached to this certification is an accompanying statement explaining Wireless Calling Concepts's procedures to ensure that it complies with the requirements set forth in §64.2001 *et seq.* of the Commission's rules to the extent that such requirements apply to Wireless Calling Concepts or to the information obtained by Wireless Calling Concepts.

Wireless Calling Concepts has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Wireless Calling Concepts has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Wireless Calling Concepts has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

Signed: _____



Date: _____

2/23/09

Wireless Calling Concepts, Inc.
Statement of CPNI Procedures and Compliance

Wireless Calling Concepts, Inc. (“Wireless Calling Concepts“) provides exclusively carrier-to-carrier telecommunications services. It has no end user customers. Consequently, Wireless Calling Concepts does not have a “subscriber” relationship with its customers and does not send “bills” to end-user customers. Wireless Calling Concepts does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. It provides service only to other carriers. Wireless Calling Concepts typically does not obtain the end-user customer’s billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end user customer’s service.

Wireless Calling Concepts does not obtain, access, or keep confidential information about its customers. Wireless Calling Concepts does not use any confidential customer information to market telecommunications services to the general public or any end-user customers.

If Wireless Calling Concepts does come into contact with confidential customer information, the company will safeguard from improper use or disclosure by employees any call detail information that Wireless Calling Concepts obtains in providing its carrier-to-carrier services. Access to call detail information will be limited to certain employees, and those employees will be trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Wireless Calling Concepts has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Wireless Calling Concepts computers and call detail records.

Because Wireless Calling Concepts provides exclusively carrier-to-carrier services, it will not use any call detail information that it may obtain in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers. Moreover, any call detail information obtained by Wireless Calling Concepts will not be made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Wireless Calling Concepts did not have any breach of its call detail records during 2008. Because Wireless Calling Concepts does not have any presubscribed customers, and does not know the identity of end users whose traffic is routed through Wireless Calling Concepts, it cannot notify those end user customers directly if a breach occurs. However, Wireless Calling Concepts has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches.