

STEPTOE & JOHNSON<sup>LLP</sup>

ATTORNEYS AT LAW

Petra A. Vorwig  
202.429.6417  
pvorwig@steptoe.com

1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
Tel 202.429.3000  
Fax 202.429.3902  
steptoe.com

February 26, 2009

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

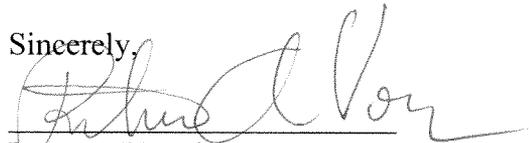
Re: **Reliance Communications International, Inc. CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

As required under Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), and Public Notice, DA 09-9, please find enclosed a certificate of compliance with the Commission's Customer Proprietary Network Information regulations submitted on behalf of Reliance Communications International, Inc. ("RCII") and signed by RCII's Executive Vice President.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Petra A. Vorwig  
*Counsel for Reliance Communications  
International, Inc.*

Encl.

cc: Enforcement Bureau – Telecommunications Consumers Division (two copies)  
Best Copy and Printing, Inc. (one copy via email)

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

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: Reliance Communications International, Inc.

Form 499 Filer ID: 825316

Name of signatory: Michael Sauer

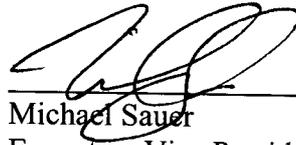
Title of signatory: Executive Vice President

I, Michael Sauer, certify that I am the Executive Vice President for Reliance Communications International, Inc. ("RCII") and, acting as an agent of RCII, that I have personal knowledge that RCII has operating procedures in place (described in Attachment A) that are adequate to ensure that RCII is in compliance with the CPNI rules of the Federal Communications Commission. *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. *See* Attachment A.

The company has not taken any actions (*e.g.* instituted proceedings or filed petitions at either state commissions, the court system, or at the Commission) 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.

A handwritten signature in black ink, appearing to read 'MS', is written over a horizontal line.

Michael Sauer  
Executive Vice President  
Reliance Communications International, Inc.

Date: February 26, 2009

**ATTACHMENT A**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

1. RCII provides the Reliance India Call service ([www.relianceindiacall.com](http://www.relianceindiacall.com)) in the United States. The Reliance India Call service is a retail long distance service that allows U.S. customers to make calls to India and other countries. RCII also provides a limited amount of private line service between the U.S. and India. RCII started providing service in the U.S. in 2004.
2. RCII does not make available and has never made available to any affiliated or unaffiliated entity information that meets the definition of CPNI set forth in 47 U.S.C. § 222(h)(1), except in the provision of telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law.
3. RCII only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. RCII does not use, and has never used, 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.*
4. Upon receipt of a customer request, RCII will disclose to such customer that customer's own CPNI under specific circumstances. Prior to releasing CPNI in response to a customer-initiated request made over the phone, RCII verifies the customer's identity through a series of questions requesting specific account information that is not readily available to individuals other than the customer. In the case of a written request, such request must be sent from the customer's registered e-mail address.

5. All RCII personnel having access to CPNI have been instructed in the companies' policies governing CPNI. It is a violation of the policies of RCII to disclose CPNI outside of RCII, except in the provision of the telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.
6. Access to CPNI at RCII 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. RCII has also adopted the PCI Data Security Standard, developed by the PCI Security Standards Council, for protecting against unauthorized external access to customer account information.
7. Strict controls are in place involving responses to law enforcement agencies that serve RCII with valid legal demands, such as a court ordered subpoena, for CPNI. RCII will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.
8. Since RCII does not use CPNI for any purpose (other than to render, and bill for, the telecommunications services it provides to its customers), and does not, under any circumstances, provide CPNI to other entities (except in the provision of telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law), it has not implemented

the prior notification and customer approval procedures set forth in the FCC's Rules for the use of CPNI.