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February 26, 2009  
**Via ECFS**

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

**RE: EB Docket No. 06-36  
Annual 64.2009(e) CPNI Certification for 2008  
WTI Communications, Inc. - Form 499 Filer ID 823572**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of WTI Communications, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to  
WTI Communications, Inc.

Attachments  
*MB/sp*

cc: FCC Enforcement Bureau (2 copies)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
T. Rodriguez - WTI  
file: WTI - CPNI  
tms: FCCx0901



Attachment A  
Statement of CPNI Procedures and Compliance

**WTI Communications, Inc.**

Calendar Year 2008

**WTI Communications, Inc.**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

WTI Communications, Inc. ("WTI Comm" or "Company") provides local, long distance and information services to business customers. The Company has established operating procedures to protect the privacy of Customer Proprietary Network Information ("CPNI") as detailed below.

The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If WTI Comm elects to use CPNI in a manner that does not require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company has adopted authentication procedures to protect against unauthorized access to CPNI during customer visits to the Company's business locations at which access to CPNI may be obtained. These procedures require the customer to provide, in the case of visits to the Company's locations, a proper photo i.d. Furthermore, Customers are provided with a Company-generated password at the time a contract for service is executed. The password is randomly generated without using readily available biographical or account information. Customer-initiated telephone contact requires that the customer provide the password in order to discuss call detail or other account-specific information. If the appropriate password is not provided, the Company does not disclose call detail over the telephone unless the customer can provide the call detail information that is the subject of the inquiry without a customer service representative's assistance.

Changes to the account, including customer employees who have access to the Company password, customer employees who can request service changes or review bills and initiate billing inquiries, address or other customer of record account changes, must be made in writing to the Company on customer letterhead and mailed or faxed to the Company from a customer fax number. The Company verifies all changes via email or in writing. In cases where a customer has a dedicated Company account representative, other authentication methods may be used as expressly set forth in the contract between the Company and the customer. The Company does not offer a back-up authentication method.

The Company has trained all personnel who have access to CPNI, or control over access to CPNI, regarding the restrictions in the uses of CPNI and the authentication requirements for disclosure of CPNI to customers. All personnel have been trained in the notification procedures to be followed in the event of a breach of CPNI. The Company has no tolerance policy for violations and will discipline, up to and including dismissal, any individual who is found to be in violation of CPNI requirements.

WTI Comm does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information and customer notification of account changes.

The Company does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable when so authorized by law enforcement. Company procedures require employees to immediately notify the Company's Chief Executive Officer. The Company's Chief Executive Officer will maintain records of all such breaches and notifications as required by the FCC's rules.

The Company has not taken any actions against data brokers in the last year.

WTI Comm did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.