

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Trillion Partners, Inc.

Form 499 Filer ID: 823288

Name of signatory: Scott Smyth

Title of signatory: Vice President Legal and Regulatory

I, Scott Smyth, certify that I am an officer of the company named above, 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.*

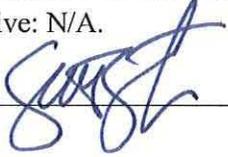
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: N/A.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: N/A.

Signed  [electronic signature]

**Accompanying Statement**  
**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
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**Trillion Partners, Inc.**

Trillion provides a hosted IP PBX-based service. Trillion does not provide dial tone, does not provide any switched services, does not route voice traffic over the Internet and does not provide basic telephone service. Trillion's fleeting collection of customer related information is strictly limited to internal call routing information necessary to connect calls to and from the local exchange carrier ("Call Routing Information"). This is not CPNI and Trillion does not create, own, receive, or transmit CPNI. Trillion provides service that "enables real-time, two-way voice communications; requires a broadband connection from the user's location; requires Internet protocol-compatible customer premises equipment (CPE); and permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network."

Call Routing Information is given on an automated basis to the local exchange carrier solely for purposes of connecting calls to and from the local exchange carrier over non-switched trunks. The customer may obtain access to its own information from the PBX-based equipment at the customer's physical premises. Because Trillion does not create, own, receive, or transmit CPNI, and the customer has direct access to its own Call Routing Information at its premises, Trillion does not provide CPNI to a customer, or any third party, requesting such information. It is Trillion's policy that no employee is authorized to obtain or release CPNI and would be disciplined accordingly for a violation of this policy. Accordingly, neither the customer, nor anyone else, can call Trillion and obtain access to such information because the customer owns such information. Trillion uses such Call Routing Information for the "provision of inside wiring installation, maintenance, and repair services."