



Anisa A. Latif
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February 27, 2009

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: AT&T Annual CPNI Compliance Certifications Calendar Year 2008
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, on behalf of the attached list of operating entities, hereby submits its annual CPNI compliance certifications for calendar year 2008 via the Commission's Electronic Comment Filing System. AT&T also provides two (2) courtesy copies to the Enforcement Bureau's Telecommunications Consumers Division and one (1) copy to Best Copy and Printing via hand delivery.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

Attachment

cc: Marcy Green

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Acadiana Cellular General Partnership	0001837814
ACC Corp.	0014553119
ACC National Telecom Corp	0013443718
Alascom, Inc.	0001572676
Alton CellTel Co. Partnership	0003767290
American Cellular, LLC	0017334806
Ameritech Payphone Services, Inc.	0007586175
AT&T Communications of California, Inc.	0003301702
AT&T Communications of Delaware, LLC.	0012838504
AT&T Communications of Hawaii, Inc.	0014532501
AT&T Communications of Illinois, Inc.	0003301793
AT&T Communications of Indiana, GP	0012838421
AT&T Communications of Maryland, LLC	0012838512
AT&T Communications of Michigan, Inc.	0003301876
AT&T Communications of Nevada, Inc.	0003301959
AT&T Communications of New York, Inc.	0012838462
AT&T Communications of NJ, LP	0012838520
AT&T Communications of Ohio, Inc.	0003301736
AT&T Communications of Pennsylvania, LLC	0012838538
AT&T Communications of Texas	0016657918
AT&T Communications of the Midwest, Inc.	0003301751
AT&T Communications of the Mountain States, Inc.	0003301892
AT&T Communications of the Pacific Northwest, Inc.	0003301710
AT&T Communications of the South Central States, LLC	0012838561
AT&T Communications of the Southern States, LLC	0012838553
AT&T Communications of the Southwest, Inc.	0003301918
AT&T Communications of Virginia, LLC	0012838546
AT&T Communications of Washington, D.C., LLC	0012838488
AT&T Communications of West Virginia, Inc.	0003301785
AT&T Communications of Wisconsin, LP	0012838454
AT&T Corp	0005937974
AT&T Mobility LLC	0004979233
AT&T Mobility of Galveston LLC	0016658122
AT&T Mobility Spectrum LLC	0014980726
AT&T Mobility Texas LLC	0016658148
AT&T of Puerto Rico, Inc.	0001731462
AT&T of the Virgin Islands, Inc.	0003464344
AWACS, Inc.	0010852523
Bauce Communications of Beaumont, Inc.	0001562040
Bellingham Cellular Partnership	0004312559
BellSouth Entertainment, LLC	0005095963
BellSouth International, LLC	0005858907
BellSouth Long Distance d/b/a AT&T Long Distance	0003733318
BellSouth Mobile Data, Inc.	0013935085

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
BellSouth Telecommunications, Inc.	0005795679
BizTel, Inc.	0003998978
Bloomington Cellular Telephone Company	0001573328
Bradenton Cellular Partnership	0004312591
Bremerton Cellular Telephone Company	0004312609
Cagal Cellular Communications Corporation	0001803246
CCPR of the Virgin Islands, Inc.	0004499034
CCPR Services, Inc.	0003473709
Centennial Beauregard Cellular LLC	0012921946
Centennial Caldwell Cellular LLC	0008816779
Centennial Cellular Tri-State Operating Partnership	0012926176
Centennial Claiborne Cellular Corp	0012926184
Centennial Communications Corp.	0009631136
Centennial Hammond Cellular LLC	0012926341
Centennial Lafayette Communications LLC	0012926424
Centennial Michiana License Company LLC	0003296480
Centennial Michigan RSA 7 Cellular Corp.	0008816944
Centennial Morehouse Celllular LLC	0003574142
Centennial Puerto Rico License Corp.	0003572864
Centennial Puerto Rico Operations Corp.	0003572849
Centennial Randolph Cellular LLC	0008816795
Centennial Southeast License Company LLC	0003296472
Centennial USVI Operations Copr.	0007467384
Champaign CellTelco	0001460537
Chattanooga MSA Limited Partnership	0001842723
Cincinnati SMSA Limited Partnership	0004160842
Cingular Wireless of Texas RSA #11 Limited Partnership	0003294048
Cingular Wireless of Texas RSA #16 Limited Partnership	0003294006
DC Newco Parent, LLC	0017235060
Decatur RSA Limited Partnership	0004588455
Dobson Cellular Systems of Alaska, LLC	0015568579
Dobson Cellular Systems, LLC	0017334780
Dobson Communications LLC	0017334889
Edge Wireless, LLC	0003800679
Elkhart Metronet, Inc.	0003594991
Florida RSA No. 2B (Indian River) Limited Partnership	0001837566
Georgia RSA No. 3 Limited Partnership	0001836998
Highland Cellular, LLC	0008951170
Hood River Cellular Telephone Company, Inc.	0001572924
Houma-Thibodaux Cellular Partnership	0004547931
Illinois Bell Telephone Company	0002860856
Indiana Bell Telephone Company, Inc.	0002904654
Lafayette MSA Limited Partnership	0001682509
Louisiana RSA No. 7 Cellular General Partnership	0001837798

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
Louisiana RSA No. 8 Limited Partnership	0001837830
Lubbock SMSA Limited Partnership	0001650787
Madison SMSA Limited Partnership	0002842060
McAllen-Edinburg-Mission SMSA Limited Partnership	0001658467
Medford Cellular Telephone Company, Inc.	0004312772
Mega Comm LLC	0012927208
Melbourne Cellular Telephone Company	0004312799
Michiana Metronet, Inc.	0003595147
Michigan Bell Telephone Company	0002776771
Milwaukee SMSA Limited Partnership	0002846293
Missouri RSA 11/12 Limited Partnership	0001658418
Missouri RSA 8 Limited Partnership	0001658442
Missouri RSA 9B1 Limited Partnership	0001658426
Nevada Bell Telephone Company	0001552173
New Cingular Wireless PCS, LLC	0003291192
Northeastern Georgia RSA Limited Partnership	0001837152
Ocala Cellular Telephone Co., Inc.	0001573492
Oklahoma City SMSA Limited Partnership	0001658392
Oklahoma Independent RSA 7 Partnership	0010698884
Oklahoma RSA 3 Limited Partnership	0001658376
Oklahoma RSA 9 Limited Partnership	0001658368
Olympia Cellular Telephone Company, Inc.	0004312807
Orlando SMSA Limited Partnership	0001843036
Pacific Bell Telephone Company	0001551530
Pine Bluff Cellular, Inc.	0001722271
Provo Cellular Telephone Company	0004312815
Reno Cellular Telephone Company	0004312864
Rural Newco LLC	0017233826
Salem Cellular Telephone Company	0004312880
Santa Barbara Cellular Systems Ltd.	0004312898
Sarasota Cellular Telephone Company	0004312906
SBC Internet Services, Inc. d/b/a AT&T Internet Services	0012536033
SBC Long Distance, LLC	0003763497
SNET America, Inc.	0003737707
SNET Diversified Group, Inc.	0007586423
South Bend Metronet Inc.	0008816910
Southwestern Bell Telephone Company	0016627473
St. Cloud Cellular Telephone Company, Inc.	0001572742
TC Systems, Inc.	0012833513
TCG America, Inc.	0003476611
TCG Chicago	0014531990
TCG Colorado	0014532022
TCG Connecticut	0014532048
TCG Dallas	0014532089

AT&T Entities

Providing telecommunications (wireless or wireline) and/or interconnected VoIP services

AT&T Entity	FCC Registration Number
TCG Detroit	0014532113
TCG Illinois	0014532162
TCG Indianapolis	0014532204
TCG Joint Venture Holdings Inc. dba TCG Oregon	0014532238
TCG Kansas City, Inc.	0014532261
TCG Los Angeles, Inc.	0014532287
TCG Maryland	0014532303
TCG Midsouth, Inc.	0014532345
TCG Milwaukee, Inc.	0014532386
TCG Minnesota, Inc.	0014532410
TCG New Jersey, Inc.	0017516725
TCG of the Carolinas, Inc.	0014532428
TCG Ohio	0014532451
TCG Omaha	0014532469
TCG Oregon	0014535009
TCG Phoenix	0014532550
TCG Pittsburgh	0014532576
TCG Rhode Island	0014532592
TCG San Diego	0014532642
TCG San Francisco	0014533004
TCG Seattle	0014533053
TCG South Florida	0014533079
TCG St. Louis	0014533087
TCG Utah	0014533111
TCG Virginia, Inc.	0014533145
TeleCorp Communications, LLC	0011499910
Teleport Communications – Washington DC, Inc.	0014533368
Teleport Communications Atlanta, Inc.	0014533178
Teleport Communications Houston, Inc.	0014533277
Teleport Communications New York	0014533301
Texas RSA 19 Limited Partnership	0001666056
Texas RSA 2 Limited Partnership	0004550547
Texas RSA 20B1 Limited Partnership	0001665058
Texas RSA 6 Limited Partnership	0001665991
Texas RSA 7B1 Limited Partnership	0001666007
Texas RSA 9B1 Limited Partnership	0001666023
The Ohio Bell Telephone Company	0002946986
The Southern New England Telephone Company	0005049150
Topeka SMSA Limited Partnership	0001658632
Visalia Cellular Telephone Company	0004312971
Wisconsin Bell, Inc.	0002716561

AT&T Inc.
Attachment to Calendar Year 2008 CPNI Certificates

**Summaries of Customer Complaints and
Actions Taken Against Data Brokers**

Summary of Customer Complaints

As required by 47 C.F.R. §64.2009(e), following is a summary of customer complaints concerning the unauthorized release of Customer Proprietary Network Information (CPNI) received by AT&T Inc. from January 1, 2008 to December 31, 2008:

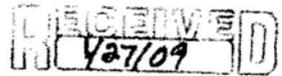
CPNI Complaint Category	Number of Customer Complaints
Complaints of improper access to CPNI by an AT&T employee or an AT&T vendor	818
Complaints of improper disclosure of CPNI to an unauthorized third party	165
Complaints of improper access to online CPNI by an unauthorized third party	261
Total	1,244

Summary of Actions Taken Against Data Brokers

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.

AT&T Alascom

CPNI Compliance Certification
Calendar Year 2008



Attachment 1

2008 AT&T Inc. CPNI Certification

Date: January 21, 2009

1. I, Michael T. Felix, President, AT&T Alascom, Inc. hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, the responsible business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. §64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instance of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Michael T. Felix

STATEMENT OF AT&T ALASCOM CPNI OPERATING PROCEDURES

1. **Registering Restrictions.** As contemplated in Rules 64.2005, 2007 and 2008 set forth at 47 CFR Part 64 et. seq., any use of CPNI to target a customer for the sale of a product or service outside of that customer's total service relationship with AT&T Alascom requires that customer's approval. AT&T Alascom has elected to pursue Approval Following Notice via an Opt-Out Approval and the notice complies with the requirements of Rules 64.2008(c) and (d), including the requirement that AT&T Alascom provide an opt-out mechanism to be available at no charge on a 24 hour per day, 7 day per week basis.

2. **Access to and Use of Customer Approvals.** In compliance with Rule 64.2009(a) set forth at 47 CFR 64 et. seq., AT&T Alascom has adopted methods and procedures and has developed and implemented systems by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. These methods and procedures and systems also govern the access to, use of, and disclosure of CPNI.

3. **Training.** In compliance with Rule 64.2009(b) set forth at 47 CFR Part 64 et. seq., AT&T Alascom employee training is required as to the requirements of the CPNI Rules and obligations of AT&T Alascom with respect to the CPNI Rules and the permissible use, access and disclosure of CPNI and aggregate customer information ("ACI").

- Employees who have no access to or use of CPNI or ACI during the course of their employment receive general awareness information to familiarize them with the general requirements of the CPNI Rules and are the subject of a supervisor certification confirming that they will not be permitted to have access to CPNI or ACI unless and until they completed the CPNI Training described below.
- Employees and representatives acting on behalf of AT&T Alascom, who have access to or use CPNI or ACI during the course of their employment or in the performance of duties under a contractual relationship are required to undertake a CPNI training course prior to being permitted access to or use of such information. The training is available on an intranet based training course.

STATEMENT OF AT&T ALASCOM CPNI OPERATING PROCEDURES

4. **Duration of Call Approvals.** As required by Rule 64.2008(f), if no opt-in or opt-out approval has been obtained from a customer, a limited one-time use or duration of call approval must be obtained in order to use a customer record to target a customer to attempt to sell products or services in a service category outside of the total service relationship. All personnel involved in customer contacts are required to follow approved scripts in requesting this type of approval, where required. If such approval is required, but not obtained, employees are trained not to use CPNI for these purposes.

5. **AT&T Alascom Policy and Disciplinary Policy.** AT&T Alascom has adopted a policy requiring compliance with the CPNI Rules. In compliance with Rule 64.2009(b) set forth at 47 CFR Part 64 et. seq., such policy provides that any failure by any personnel to comply with the CPNI Rules is subject to personnel disciplinary procedures for each company, which procedures can include termination of employment or contractual agreement, depending on the nature and severity of the non-compliance.

6. **Compliance by Third Parties.**

In compliance with Rule 64.2007(b) set forth at 47 CFR Part 64 et. seq., AT&T Alascom has procedures in place designed to ensure that,

- Only with opt-out or opt-in approval can a customer's individually identifiable CPNI be **used** for the purpose of marketing communications-related services (outside the total service relations) to that customer.
- Only with opt-out or opt-in approval, can a customer's individually identifiable CPNI, be **disclosed** for the purpose of marketing communications-related services outside the total service relationship to any AT&T Company (i) agent, (ii) affiliate that provides communications-relations services, and (iii) joint venture partner and independent contractor (opt in only).
- Only with opt-in approval can a customer's individually identifiable CPNI, be disclosed for the purpose of marketing non-communications-related services to any AT&T Company (i) agent, (ii) affiliate that provides non-communications-related services, and (iii) joint venture partner and independent contractor.

STATEMENT OF AT&T ALASCOM CPNI OPERATING PROCEDURES

7. **Compliance with New Authentication and Notification Rules**
In compliance with Rule 64.2010, set forth at 47 CFR Part 64 et. seq., system changes, training and methods and procedures have been developed, adopted, and implemented that are designed to ensure compliance with the requirements concerning authentication (online and offline), password establishment and reset procedures, and notification of account changes involving changes to passwords, postal billing addresses and email addresses.
8. **Monitoring for and Confirming Compliance**
Through either (a) formal audits conducted by the AT&T Audit department (b) operational reviews conducted by the AT&T Regulatory Compliance organization, or (c) routine operational monitoring and reviews by the AT&T Alascom Compliance organization, instance of non-compliance with AT&T's operating procedures and/or the FCC's CPNI rules may be identified. In the event any such instances are identified, a remedial plan is promptly developed by AT&T Alascom operations and approved by the relevant organization identifying the instance and by the AT&T Legal Department. Such approved remedial plan is promptly implemented and checked for adequacy to ensure compliance with the FCC CPNI rules and AT&T operating procedures.

AT&T

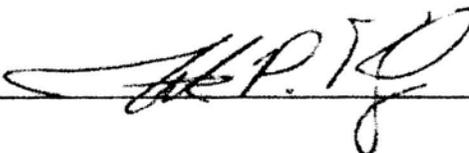
Asset Protection

CPNI Compliance Certification
Calendar Year 2008

**AT&T Inc., CPNI Certification
Calendar Year 2008**

Date: 1-21-09

1. I, Jonathan P. Klug, Senior Vice President & Treasurer, AT&T Management Services, L.P./Finance, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.
2. In accordance with the requirements of 47 C.F.R. § 64.2009(e), I certify that for the calendar year 2008, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").
3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

2008 EXPLANATORY STATEMENT OF CPNI COMPLIANCE

In accordance with section § 64.2011(e), I, Jonathan Klug, Senior Vice President & Treasurer, am providing the following explanation of how the operating procedures established by the Asset Protection organization of AT&T Services, Inc. ensure AT&T's compliance with the following identified requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2011 (a), (b) (1)-(3), (d).

1. AT&T established processes, procedures and training for Asset Protection personnel to manage the reporting of breaches to law enforcement to ensure compliance with the requirements set forth in 47 C.F.R. § 64.2011 (a), (b) (1)-(3). Asset Protection has been designated as the sole AT&T organization with the authorization and responsibility to report breaches to law enforcement.
2. Asset Protection has developed processes and procedures to ensure compliance with 47 C.F.R. § 64.2011 (d). Asset Protection maintains records of discovered breaches to include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstance of the breach. These records will be retained for a minimum of 2 years.

AT&T

Business Services

CPNI Compliance Certification
Calendar Year 2008

**AT&T Inc. CPNI Certification
Calendar Year 2008**

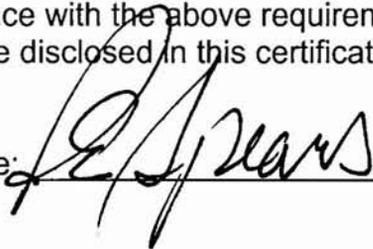
Date: Feb 2, 2009

1. I, Ronald E Spears, Group President - AT&T Business Services hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that for the calendar year 2008, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

A handwritten signature in black ink, appearing to read "R. E. Spears", is written over a horizontal line. The signature is cursive and somewhat stylized.

2008 EXPLANATORY STATEMENT OF CPNI COMPLIANCE

In accordance with the requirements of 47 C.F.R. § 64.2009(e) of the FCC rules regarding CPNI, AT&T provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for AT&T Business Services.

- 1) AT&T has processes in place to protect the access to Customer Proprietary Network Information as defined in 47 C.F.R. § 64.2001 et seq.**
- 2) AT&T has established operating procedures designed to disallow the use of CPNI for purposes of marketing services outside of the category or categories of services (i.e., local, interexchange and CMRS) to which the business customer subscribes with AT&T, unless the customer has given AT&T CPNI approval. See 47 C.F.R. § 64.2005.**
- 3) AT&T has processes and procedures in place designed to obtain business customer approval to use, disclose or permit access to CPNI if AT&T intends to use CPNI in circumstances where such approval would be required. As part of the CPNI solicitation process, AT&T has implemented procedures designed to advise business customers of their right to restrict use of, disclosure of, and access to CPNI, and provides the customer the requisite notice information required by 47 C.F.R. §§ 64.2007 and 64.2008.**

- 4) **AT&T has established methods and procedures designed to ensure that AT&T obtains opt-in customer consent to use CPNI in those circumstances where such consent is required. AT&T has established procedures designed to ensure that it maintains records for at least one year of the customer's consent. See 47 C.F.R. § 64.2007**
- 5) **AT&T has established methods and procedures designed to implement customer notifications to comply with the FCC rules, including storage and archiving of notifications for a minimum of one year required by 47 C.F.R. § 64.2008.**
- 6) **AT&T has established methods and procedures designed to implement the CPNI requirements set forth in Part 64, Subpart U of the Commission's rules. AT&T has provided adequate training and implemented appropriate methods and procedures regarding CPNI compliance for AT&T personnel with access to CPNI. AT&T personnel with access to CPNI are instructed to follow AT&T's methods and procedures for accessing, using and disclosing CPNI. In addition, AT&T has implemented a disciplinary process for CPNI violations. See 47 C.F.R. § 64.2009**
- 7) **AT&T has implemented a system that allows the business customer's CPNI approval status to be established prior to the use of CPNI. See 47 C.F.R. § 64.2009**

- 8) **AT&T has provided adequate training to employees on when they are and are not authorized to use CPNI. AT&T has established a strict Privacy Policy that explains CPNI in detail, and employees adhere to the AT&T Code of Conduct which describes employees obligation to protect customer information. See 47 C.F.R. §64.2009.**
- 9) **AT&T has processes in place and steps to enhance supervisory review processes that are related to carrier compliance, including supervisory approval of any proposed outbound marketing request for customer approval, and for the maintenance of records related to carrier compliance. 47 C.F.R. § 64.2009 (d).**
- 10) **AT&T has processes whereby AT&T employees, agents and representatives are required to make a record of any customer complaints regarding the unauthorized release of CPNI. 47 C.F.R. § 64.2009 (e).**
- 11) **AT&T has established methods and procedures designed to ensure that AT&T properly authenticates a customer's identity prior to disclosing CPNI on customer initiated telephone calls, via on-line account access and in-person contacts, including the establishment of passwords and back-up authentication features for lost or forgotten passwords. See 47 C.F.R. § 64.2010**

- 12) **AT&T has established methods and procedures designed to ensure that AT&T properly notifies customers of account changes. See 47 C.F.R. § 64.2010**
- 13) **AT&T has established methods and procedures designed to ensure that AT&T properly notifies customers in the case of a CPNI security breach. See 47 C.F.R. § 64.2011**

Centers Sales & Services
AT&T
Mobility & Consumer
Markets

CPNI Compliance Certification
Calendar Year 2008

2008 AT&T Inc. CPNI Certification

Date: _____ February 2, 2009 _____

1. I, Mark Keiffer, President – Centers Sales and Service, AT&T Mobility and Consumer Markets, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T employees within the AT&T Centers Sales and Service group upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that for the period encompassed by this certification, AT&T Consumer Sales and Service Centers have been directed to follow established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 *et. seq.* (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____

Handwritten signature of Mark Keiffer in black ink, written over a horizontal line.

**EXPLANATORY STATEMENT OF CPNI COMPLIANCE FOR 2008
OF MARK KEIFFER, PRESIDENT – CENTERS SALES AND SERVICE, AT&T
MOBILITY AND CONSUMER MARKETS**

In accordance with Section 64.2009(e) of the CPNI rules, I am providing the following explanation of how the operating procedures established by the AT&T Mobility and Consumer Markets – Centers Sales and Service organization (my organization) ensures compliance with the specific requirements set forth in Subpart U- Customer Proprietary Network Information of the FCC's rules. This statement summarizes and explains the procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in my organization, or (ii) developed by other organizations, in which case my organization operates in compliance with such applicable processes and procedures.

A.. Customer CPNI Approvals. To the extent applicable my organization has:

1. Established and distributed methods and procedures (M&Ps) whereby personnel were not to disclose or permit access to customer's CPNI for "out of category" services without customer approval or unless such disclosure or access was permitted under FCC rules and personnel were apprised that any approval or disapproval by a customer of the use, disclosure or access to the customer's CPNI must remain in effect until revocation or limitation of such approval or disapproval. See 47 C.F.R. §64.2005(a) and (b), and 47 C.F.R. §64.2007(a)(2).
2. Established and distributed M&Ps whereby personnel were required to make a record of a customer's consent to the use of CPNI information. Such records are maintained for at least one year. See 47 C.F.R. §64.2007(a)(3).
3. Established and distributed M&Ps whereby personnel were prohibited from the use, disclosure or access to a customer's individually identifiable CPNI, except where: (1) the customer granted "opt in approval" as defined in 47 C.F.R. §64.2003(k); (2) such use or disclosure was permissible under 47 C.F.R. §64.2005; (3) such use or disclosure was

otherwise permissible under section 222 of the Telecommunications Act of 1934, as amended. See 47 C.F.R. §64.2007(b).

4. Established and distributed M&Ps whereby personnel were required, prior to any solicitation for customer approval to use, disclose, or permit access to the customer's CPNI, to notify the customer of the customer's right to restrict use, disclosure and access to CPNI. See 47 C.F.R. §64.2008(a)(1). Also, established and distributed M&Ps whereby personnel were required to make a record of customer's consent to the use of CPNI information in compliance with 47 C.F.R. §64.2007(a)(3) and 47 C.F.R. §64.2008(a)(1).

5. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for customer approval, to notify the customer on an individual basis of the customer's right to restrict the use of, disclosure of, and access to that customer's CPNI. 47 C.F.R. §64.2008(b) and (c).

6. Maintained an IVR and toll free number with voice mail whereby customers, at no additional cost, could avail themselves of an "opt-out" method. The IVR and voice mail were available 24 hours a day, seven days a week. See 47 C.F.R. §64.2008(d)(3)(v).

7. Established and distributed M&Ps or scripts whereby personnel were required, prior to any oral solicitation for limited, one time use of a customer's CPNI for duration of the call, to provide the customer with the required notifications as set forth in 47 C.F.R. §64.2008(f).

8. Established M&Ps or implemented systems to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. See 47 C.F.R. §64.2009(a).

B. Training and Discipline:

1. My organization requires all personnel who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training. In addition, my organization periodically provides such personnel information on CPNI and other privacy related issues through less formal education methods such as employee communications, refresher training, and meetings. See 47 C.F.R. §64.2009 (b).

2. AT&T maintains a policy requiring compliance with the CPNI rules and advises in the CPNI training and in its Code of Business Conduct that any failure to comply with the

CPNI rules is subject to a range of actions up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. §64.2009 (b).

C. CPNI Complaints and Breaches: To the extent applicable my organization has apprised relevant personnel that: (a) they are required to make a record of any customer complaint regarding unauthorized access to, disclosure or release of CPNI through a tracking system; and (b) they are required to refer complaints to the appropriate business organization if the complaint involves fraud or identity theft. See 47 C.F.R. §64.2009 (e).

D. Security and Authentication. To the extent applicable my organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone in a manner consistent with 47 C.F.R. § 64.2010(e)
3. Established procedures for online access to CPNI in a manner consistent with 47 C.F.R. § 64.2010 (c) and (e).
4. Established procedures that notify customers immediately when there has been a change to the account as contemplated by 47 C.F.R. §64.2010 (f).

Consumer Wireline & Wireless Marketing AT&T Operations

CPNI Compliance Certification
Calendar Year 2008

2008 CPNI Certification

Date: 1/26/09

1. I, David Christopher, Chief Marketing Officer for consumer wireline and wireless marketing organization, hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, consumer wireline and wireless marketing for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 

David Christopher

Chief Marketing Officer – AT&T Mobility & Consumer Markets

2008 Explanatory Statement of CPNI Compliance - Wireline

In accordance with section 64.2009(e) of the FCC's rules, I, David Christopher, Chief Marketing Officer-Consumer and Mobility, am providing the following explanation of how the operating procedures established by the Consumer Marketing organization of AT&T Operations, Inc. ensured AT&T's compliance with the following identified requirements set forth in Subpart U- Customer Proprietary Network Information of the FCC's rules for 2008-47 C.F.R. §§ 64.2005(b); 64.2007; 64.2008(a)-(e), and 64.2009(a),(b),(d), and (e).

1. AT&T has established procedures to manage the development, approval and delivery of legally required notices to AT&T consumer customers, including CPNI opt-out notices.
2. AT&T has established procedures to oversee the Consumer customer notification process, has established specific job functions to serve as a CPNI resource to the Consumer and Business Marketing organizations within AT&T Operations, Inc. and has established procedures to direct the development of new processes within AT&T Operation, Inc., when CPNI rules are modified by the Commission.
3. AT&T has established procedures for direct observations of Customer Legal Notifications process and procedures within the Consumer Marketing Organization.
4. AT&T has established procedures to confirm that post sale communications vendors using CPNI for AT&T marketing campaigns were in compliance with the requirements of § 64.2007 (b). Such procedures include notifying vendors that they must:
 - provide a statement of confidentiality with regard to any access to AT&T customer CPNI;
 - acknowledge that customer information may be subject to certain privacy laws and regulations;
 - treat customer information as private, sensitive and confidential, including the implementation of appropriate protections to ensure the ongoing confidentiality of customer CPNI.

In addition, AT&T requires that all contracts with relevant vendors include specific language that ensures ongoing compliance with the requirements of § 64.2007 (b).

5. AT&T has developed processes and procedures to ensure that National Mass Markets provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI prior to solicitation by, among other things, developing training for customer service representatives, initiating system and scripting changes as required by changing regulations, and conducting weekly status meetings to ensure National Mass Markets remains in compliance.
6. AT&T has developed processes and procedures to ensure that it complies with customer notification requirements prior to use of a customer's CPNI for marketing purposes and that requests for marketing lists receive supervisory approval and screening by the competitive analytics groups (CA&R) before being released for use by Consumer Marketing.

**AT&T MOBILITY & CONSUMER MARKETS: MARKETING - WIRELESS
EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2008**

In accordance with Section 64.2009(e) of the CPNI rules, the Marketing Organization within AT&T Mobility & Consumer Markets, has adopted procedures that are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes and explains these procedures and explains how these procedures were designed to ensure compliance with the CPNI rules.

A. Customer CPNI Approvals. My organization has:

1. Established processes and controls preventing the use of, disclosure of, or access to CPNI to market service offerings that are not within a category of service to which the customer already subscribes from AT&T Mobility or its affiliates (“out-of-category services”) or any other purpose requiring customer approval, unless: (a) such access, use, or disclosure is permitted under the FCC’s rules without customer approval. See 47 C.F.R. § 64.2005; or (b) the customer granted limited, one-time use “opt-in approval” as defined in 47 C.F.R. § 64.2003(k) for the duration of a call See 47 C.F.R. § 64.2007(b) and 47 C.F.R. § 64.2008(f).
2. Established processes and controls to maintain a record, for at least one year, of limited, one-time use approval to use a customer’s CPNI to market “out-of-category” services for the duration of a call. See 47 C.F.R. § 64.2007(a)(3).
3. Established processes and controls to orally notify the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI consistent with 47 C.F.R. § 64.2008(a)(1) and to provide the customer the requisite notice information required by 47 C.F.R. § 64.2008(c) prior to any solicitation for limited, one-time use approval to use CPNI to market “out of category” services. See 47 C.F.R. § 64.2008(f).

B. Training and Disciplinary Policy. Processes and controls are in place in my organization that:

1. Require all employees to review and certify to AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. In addition, all employees who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications and meetings. See 47 C.F.R. § 64.2009(b).

2. Maintain a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. My organization:

1. Maintains a record, for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered that is maintained. See 47 C.F.R. § 64.2009(c).

2. Has established a supervisory review process for all outbound marketing campaigns to assure that all sales and marketing campaigns that propose to use CPNI are reviewed and approved. All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and approval to the Customer Lifecycle Marketing groups. See 47 C.F.R. § 64.2009(d).

D. Security and Authentication. My organization has:

1. Established processes and controls that take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI including the following:

- a) Requiring security industry-standard format for account level passcodes and online passwords;

- b) Blocking access to customer's online account after repeated unsuccessful attempts to log into that account;
- c) Annual review of employee login controls; and
- d) Investigation referral process for suspected social engineering attempts.

See 47 C.F.R. § 64.2010(a).

2. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all points of access including IVR, phone, online, or retail. See C.F.R. § 64.2010(a).

3. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e). With the exception of mailing monthly billing statements, AT&T Mobility has established processes and controls designed to ensure that call detail records are only mailed to an address that has been associated with a customer's account for at least thirty days. See 47 C.F.R. § 64.2010(b).

4. Established processes and controls to authenticate a customer or authorized user without the use of readily available biographical information or account information prior to allowing the customer or authorized user online access to CPNI. A customer or authorized user may only obtain online access to CPNI after providing a password established in accordance with 47 C.F.R. § 64.2010(e). See 47 C.F.R. § 64.2010(c).

5. Established a retail account access policy that prohibits access to or disclosure of CPNI except to customers and authorized users who first provide a valid government-issued photo ID matching their name on the account. See 47 C.F.R. § 64.2010(d).

6. Established processes and controls to authenticate a customer or authorized user without the use of readily available biographical information or account information in order to establish a password that grants access to CPNI online, over the phone, or in the retail store. See 47 CFR 62010(e).

7. Established back-up authentication methods and methods to establish a new password in manner consistent with 47 C.F.R. § 64.2010(e) in the event of a lost or forgotten password without prompting the customer or authorized user for readily available biographical information or account information. See 47 C.F.R. § 64.2010(e).

8. Established processes and controls to notify the customer via text message or call to the telephone number of record, as defined in 47 C.F.R. § 64.2003(q), or email or postal mail to an address of record, as defined in 47 C.F.R. § 64.2003(b), when a password, back-up means of authentication for lost or forgotten passwords, an online account, or an address of record is created or changed and to ensure that the content and delivery of such notice is in accordance with 47 C.F.R. § 64.2010(f).

9. Established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as “breach” is defined in 47 C.F.R. § 64.2011(e), are logged and processed for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011.

Retail Sales & Services
AT&T
Mobility & Consumer
Markets

CPNI Compliance Certification
Calendar Year 2008

2008 CPNI Certification
Retail Sales and Service, AT&T Mobility and Consumer Markets

Date: January 30, 2009

1. I, Paul Roth, President – Retail Sales and Service for AT&T Mobility and Consumer Markets, (“Responsible Business Unit”)] hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 
Paul Roth, President – Retail Sales and Service

**AT&T MOBILITY AND CONSUMER MARKETS – Retail Sales and Service
EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2008**

In accordance with Section 64.2009(e) of the Federal Communication Commission’s (“FCC”) CPNI rules, AT&T Mobility and Consumer Markets – Retail Sales and Service [“My Organization”], has adopted procedures that are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes and explains these procedures and explains how these procedures were designed to ensure compliance with the CPNI rules. The described processes and procedures have either been (i) developed and implemented in My Organization, or (ii) developed by other organizations, in which case My Organization operates in compliance with such applicable processes and procedures.

A. Customer CPNI Approvals. My Organization has:

1. Established processes and controls preventing the use of, disclosure of, or access to CPNI to market service offerings that are not within a category of service to which the customer already subscribes from AT&T or its affiliates (“out-of-category services”) or any other purpose requiring customer approval, unless: (a) such access, use, or disclosure is permitted under the FCC’s rules without customer approval. See 47 C.F.R. § 64.2005; or (b) the customer granted limited, one-time use “opt-in approval” as defined in 47 C.F.R. § 64.2003(k) for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(b) and 47 C.F.R. § 64.2008(f).
2. Established processes and controls to maintain a record, for at least one year, of limited, one-time use approval to use a customer’s CPNI to market “out-of-category” services for the duration of a call or the duration of a visit. See 47 C.F.R. § 64.2007(a)(3).
3. Established processes and controls to orally notify the customer of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI consistent with 47 C.F.R. § 64.2008(a)(1) and to provide the customer the requisite notice information required by 47 C.F.R. § 64.2008(c) prior to any solicitation for limited, one-time use approval to use CPNI to market “out of category” services. See 47 C.F.R. § 64.2008(f).

B. Training and Disciplinary Policy.

1. My Organization requires all employees to review and certify to AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. AT&T further requires all employees who have access to customer data or who have outbound marketing responsibilities to complete specific CPNI training and provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications. See 47 C.F.R. § 64.2009(b).
2. AT&T maintains a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. All Sales and Marketing Campaigns in which My Organization engages are conducted pursuant to processes and procedures whereby such activities are reviewed and receive the requisite supervisory approval and in connection with which the requisite records are maintained for a one year period.

D. Security and Authentication. My Organization has:

1. Established account access policies that outline what information is required to properly authenticate a customer or an authorized user before release of CPNI for all applicable points of access. See C.F.R. § 64.2010(a).
2. Established methods and procedures prohibiting the disclosure of call detail over the phone unless the customer provides a password established in a manner consistent with 47 C.F.R. § 64.2010(e).
3. Established a policy that prohibits access to or disclosure of CPNI except to customers and authorized users who first provide a valid photo ID matching their name on the account. See 47 C.F.R. § 64.2010(d).

4. Established processes and controls to authenticate a customer or authorized user without the use of readily available biographical information or account information in order to establish a password that grants access to CPNI. See 47 CFR 64.2010(e).

5. Followed AT&T's established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as "breach" is defined in 47 C.F.R. § 64.2011(e), are logged and processed for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011.

SBC Long Distance, LLC
d/b/a AT&T Long
Distance

CPNI Compliance Certification
Calendar Year 2008

2008 AT&T Inc. CPNI Certification

Date: January 28, 2009

1. I, Denise Iverson, Director – Network Operations, as an officer of SBC Long Distance, LLC d/b/a/ AT&T Long Distance (“Responsible Business Unit”) hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____



Denise Iverson

Explanatory Statement of CPNI Compliance

In accordance with Section 64.2009(e) of the FCC's rules, SBC Long Distance, LLC ("SBCLD") provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for its customers.

SBCLD has no sales channels of its own for retail services, but sells such services through the sales channels of affiliated AT&T companies, each of which is charged with ensuring compliance with the requirements set forth in *Subpart U - Customer Proprietary Network Information* of the FCC Rules, 47 CFR §§ 64.2001 *et seq.* (the "FCC's CPNI rules"). SBCLD relies on the certifications of the affiliated AT&T companies to affirm that, as of the date of this certificate, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.

Prior to any solicitation for CPNI approval, SBCLD provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI, consistent with the notice rules set forth in 47 CFR §§ 64.2007 and 64.2008.

SNET America, Inc.
d/b/a AT&T Long
Distance East

CPNI Compliance Certification
Calendar Year 2008

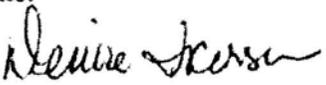
2008 AT&T Inc. CPNI Certification

Date: January 30, 2009

1. I, Denise Iverson, Director – Network Operations, as an officer of SNET America, Inc., d/b/a/ AT&T Long Distance East (“Responsible Business Unit”) hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: 
Denise Iverson

Explanatory Statement of CPNI Compliance

In accordance with Section 64.2009(e) of the FCC's rules, SNET America, Inc. ("SAI") provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for its customers.

SAI has no sales channels of its own for retail services, but sells such services through the sales channels of affiliated AT&T companies, each of which is charged with ensuring compliance with the requirements set forth in *Subpart U - Customer Proprietary Network Information* of the FCC Rules, 47 CFR §§ 64.2001 *et seq.* (the "FCC's CPNI rules"). SAI relies on the certifications of the affiliated AT&T companies to affirm that, as of the date of this certificate, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.

Prior to any solicitation for CPNI approval, SAI provides individual notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI, consistent with the notice rules set forth in 47 CFR §§ 64.2007 and 64.2008.

BellSouth Long Distance, Inc.
d/b/a
AT&T Long Distance Service

CPNI Compliance Certification
Calendar Year 2008

2008 AT&T Inc. CPNI Certification

Date: 2/23/2009

1. I, Denise Iverson, Director – Network Operations, as an officer of BellSouth Long Distance, Inc d/b/a/ AT&T Long Distance Service (“Responsible Business Unit”)] hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2008, the Responsible Business Unit(s) for which I am accountable has established safeguards and operating procedures to support compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC’s rules, 47 C.F.R. § 64.2001 et. seq. (the “FCC’s CPNI rules”).

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: Denise Iverson

Explanatory Statement of CPNI Compliance

In accordance with Section 64.2009(e) of the FCC's rules, BellSouth Long Distance, Inc d/b/a AT&T Long Distance Service ("BellSouth LD") provides the following explanation of how its operating procedures are adequate to ensure compliance with the CPNI rules for its customers.

BellSouth LD has no direct sales channels or customer care functions of its own but sells its services and manages its customer care through its affiliated incumbent local exchange company ("Affiliate") via a joint marketing agreement. This Affiliate is charged with ensuring compliance with the requirements set forth in *Subpart U – Customer Proprietary Network Information* of the FCC Rules, 47 CFR §§ 64.2001 *et seq.* (the "FCC's CPNI rules"). BellSouth LD relies on the certifications of the Affiliate to affirm that, as of the date of this certificate, there are operating procedures in place that are adequate to ensure compliance with the FCC's CPNI rules.

BellSouth LD also has a billing and collections agreement with an unaffiliated telecommunications provider. BellSouth LD has reviewed documentation provided by the unaffiliated telecommunications provider and has confirmed that the unaffiliated telecommunications provider has adopted procedures to ensure that it complies with all FCC CPNI rules when performing work on behalf of BellSouth LD. Additionally, the unaffiliated telecommunications provider personnel have been trained to refer all customer care inquiries to the aforementioned Affiliate.