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February 27, 2009

Via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36 – Annual CPNI Compliance Certification

Dear Secretary Dortch:

Aircell LLC and Aircell Business Aviation Services LLC (“Aircell BAS”), pursuant to the Commission’s February 17, 2009 *Public Notice* (DA 09-240) issued in the above-referenced proceeding, hereby submit the attached Section 64.2009(e) CPNI Certification together with an accompanying explanatory statement. The certification includes these two entities, which are both wholly-owned subsidiaries of AC Holdco LLC, because the specific business operation covered by this filing – the resale of satellite telecommunications services to the general aviation market – was assigned from Aircell LLC to Aircell BAS on June 13, 2008 as part of an internal reorganization.

Consistent with the requirements of the *Public Notice*, two copies of this submission are being delivered to the Enforcement Bureau, Telecommunications Consumers Division, and one copy to the Commission’s copy contractor, Best Copy and Printing, Inc.

Please address any questions concerning this submission to the undersigned.

Respectfully submitted,

/s/ David L. Martin

David L. Martin
Counsel to Aircell LLC and
Aircell Business Aviation Services LLC

cc: Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

**AIRCELL LLC &
AIRCELL BUSINESS AVIATION SERVICES LLC
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 companies covered by this certification: **Aircell LLC
Aircell Business Aviation Services LLC**

Form 499 Filer ID: **822226***

Name of signatory: **Marguerite Elias**

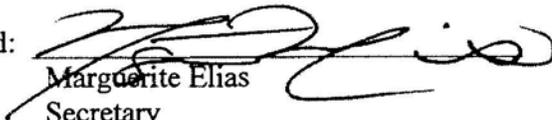
Title of signatory: **Secretary**

I, Marguerite Elias, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions against data brokers in the past year, and have no knowledge of any attempts by data brokers or pretexters to access the CPNI of the companies' customers.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: 
Marguerite Elias
Secretary
Aircell LLC & Aircell Business Aviation Services LLC
1250 N. Arlington Heights Road, Suite 500
Itasca, IL 60143

* This Filer 499 ID number was transferred from Aircell LLC to Aircell Business Aviation Services LLC ("Aircell BAS") in 2008, subsequent to the assignment of the telecommunications services business (not involving any licenses) from Aircell LLC to Aircell BAS on June 13, 2008.

Aircell LLC & Aircell Business Aviation Services LLC
Explanatory Statement Regarding
CPNI Compliance

On June 13, 2008, the general aviation services business of Aircell LLC was assigned to its newly-created affiliate, Aircell Business Aviation Services LLC. Aircell LLC no longer provides telecommunications services. For the purposes of this Explanatory Statement, the term “Aircell” will refer to Aircell LLC for the period up until June 13, 2008, and will refer to Aircell Business Aviation Services LLC for the period from June 13, 2008 forward.

Aircell is a specialized reseller of satellite telecommunications services to the general aviation market. Aircell has a limited customer base of approximately 5,000, most of which are independent corporate and fractional aircraft owners/operators.

Aircell does not use CPNI for marketing purposes, except to market Aircell service offerings within the same category of service (*i.e.*, CMRS) to which the customer already subscribes, as permitted by Section 64.2005(a) without customer approval. Aircell does not disclose or permit access to CPNI to third parties for marketing purposes. Therefore, requirements contained in the CPNI rules relating to the process for obtaining customer consent for the use of CPNI for marketing purposes are not applicable to Aircell. Should Aircell change its policies in the future, it will ensure that the appropriate procedures are in place for obtaining customer consent.

Aircell provides adequate safeguards to protect against the unauthorized release of CPNI. Access to CPNI is not provided in person, as Aircell does not have retail stores. CPNI is not released in response to customer-initiated telephone calls until the customer has been properly authenticated. No call detail information is released in response to customer-initiated telephone calls, although Aircell representatives will discuss call detail information that is first provided by the customer. Otherwise, requests for call detail information are satisfied by contacting the authorized account representative at the telephone number or address (including e-mail address) of record. Online access to CPNI is available only through the use of customer-generated passwords, for which Aircell does not prompt the use of biographical or account information. The authorized account representative is notified whenever there has been a change to a password or to account details (*e.g.*, account address).

Aircell has not experienced any known breaches of CPNI to date. However, Aircell is aware of its obligation to report any breaches to law enforcement agencies via the breach reporting facility located at <https://www.cpnireporting.gov/>. Aircell further understands that it may not notify the affected customer for seven days after reporting the breach. Aircell will retain for two years records relating to any discovered breaches.

Aircell takes seriously its obligation to safeguard CPNI. Aircell has trained its employees with access to CPNI on the limited purposes for which they are authorized to use CPNI, and on the critical importance of adequately protecting CPNI from misuse or unauthorized disclosure. It is Aircell policy that any employee who fails to follow Aircell policies and procedures with regard to CPNI will be subject to disciplinary action.