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

EB Docket 06-36

Annual 64.2009(e) CPNI Certificate for calendar year 2008.

Name of companies covered by this certificate: Denali Spectrum License Operations, LLC ("Denali License Operations").

Form 499 Filer ID: 827359

Name of signatory: Allen Todd

Title of signatory: Assistant Secretary

I, Allen Todd, certify that I am an officer of the sole manager of the sole manager of the sole manager of the sole manager of the company named above ("Company"), and acting as an agent for 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, court system, or at the Commission) against data brokers in the past year. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's internal procedures for compliance with the Commission's CPNI rules.

The Company has not received any customer complaints concerning the unauthorized release of CPNI.

This certification is made to the best of my knowledge, information and belief.

Signed

Denali Spectrum License Operations, LLC

By:_____

Allen Todd

Assistant Secretary of the sole manager of the sole manager of the sole manager of the sole manager

Dated: 2/27/2009

Customer Proprietary Network Information (CPNI")
Procedures Statement

Denali Spectrum License Operations, LLC ("Denali License Operations" or "Company"), by this statement, explains the internal procedures of the Company to ensure that it is in compliance with the Federal Communications Commission's ("Commission's") CPNI rules.

Uses of CPNI for Marketing

- The Company uses, discloses, and permits access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already purchases from the Company, without customer approval. The Company does not use, disclose or permit access to CPNI for the purpose of marketing any additional services outside of the categories of service to which the customer already purchases from the Company.

- The Company does not share the CPNI of a customer with any affiliate or third party for purposes of marketing any services.

Permitted Uses of CPNI

- The Company permits the use and disclosure of, and access to CPNI, either directly or indirectly through its agent, to (a) initiate, render, bill, and collect for its telecommunications services; and (b) protect the rights or property of the Company, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

- The Company permits the use and disclosure of, and access to CPNI for purpose of providing customer premise equipment ("CPE"), information services, and to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex like features.

Protections of CPNI

- The Company does not provide customers access to Call Detail Records ("CDRs") on-line (via the internet) or over-the-phone (via its call centers). A customer may only obtain CDR information by visiting a corporate-operated retail location and completing a CDR Request Form, which must be notarized and

presented with a valid photo identification. All CDR Requests Forms are approved and processed by Company management. CDRs also may be obtained by a subpoena, search warrant or court order, which are reviewed and approved by the Company's Subpoena Compliance Department.

- The Company enables customers to view their bill and change certain account information (*i.e.*, billing address, alternative contact numbers, etc.) on-line. If and when a customer wants to create an on-line account they must log on to www.mycricket.com and create an on-line account.[1] On-line accounts are password protected. Passwords (initial and resets) are sent to the customer's Denali License Operations phone via a text message. This is the only way in which a customer may receive a password for on-line account access.

- In order to access non-CDR information via a Denali License Operations call center, a customer must provide his/her Denali License Operations telephone number and certain additional account verification information.

- The Company's policy is to require a customer to present a valid photo ID matching the customer's account information before CPNI information is disclosed to the customer in Company's retail location.

- Anytime a customer's password is established or reset, notification is sent to the customer's Denali License Operations phone via text message. A notification also is sent to the customer's Denali License Operations phone via text message anytime account information (*i.e.*, address of record, alternative contact numbers, etc.) is changed.

- The Company will disclose CPNI upon affirmative written request by the customer to any person designated by the customer. All such requests for CPNI must be verified and approved by Denali License Operations management before disclosing the requested CPNI.

- Within seven (7) days of a reasonable determination of a breach (*i.e.*, CPNI disclosed to a third party without customer authorization), the Company will notify

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[1] As reflected in numerous Denali filings before the Commission, Denali offers service under the Cricket brand name pursuant to a Trademark License Agreement with Cricket Communications, Inc.

the US Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni. After seven (7) days of USSS and FBI notice, if the Company has not received written direction from the USSS or the FBI, the Company will notify the customer of the breach, unless the USSS and the FBI have extend the period for such notice. For two (2) years following USS and FBI notice, the Company will maintain a record of: (1) discovered breaches; (2) notifications to the USSS and the FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates the Company notified the USSS and the FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

Training and Recordkeeping

- Denali License Operations employees are educated and trained as to the proper protection, uses and treatment of confidential customer information, including CPNI. Denali License Operations employs appropriate remedies against those persons violating the Company's internal CPNI procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.

- The Company maintains a record of sales and marketing campaigns that use CPNI, including any instances when CPNI is disclosed or provided to third parties or when third parties are allowed access to CPNI. The record is required to include a description of each campaign, the specific CPNI that was used in the campaign, what products and services were offered as part of the campaign. Such records are required to be retained for at least one (1) year following the sales and marketing campaign.

- The Company maintains a supervisory review process regarding compliance with the rules for outbound marketing situations and maintains records of compliance for a minimum of one (1) year following the supervisory review. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for customer approval.