

**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(s) covered by this certification: Coupe Communications, Inc., Coupe Communications, LLC, John Parke Coupe, Jr.

Form 499 Filer ID: N/A

Name of signatory: John Parke Coupe, Jr.

Title of signatory: President

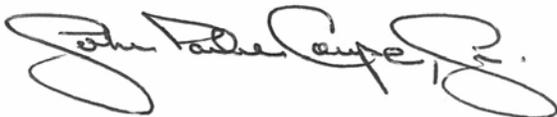
I, John Parke Coupe, Jr., certify that I am an officer of the company(s) named above (collectively hereafter referred to as "Coupe"), and acting as an agent of the company(s), that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with 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(s) have 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.

The company(s) have 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).

Signed

A handwritten signature in black ink that reads "John Parke Coupe, Jr." with a stylized flourish at the end.

Owner/President

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**Supporting Statement**

- (a) “Coupe” has implemented a system whereby it does not use CPNI information for purposes other than invoicing of service. “Coupe” shall clearly establish customer approval prior to any other proposed use of CPNI in conformance with CFR 47 Part 64.
- (b) “Coupe” has trained all personnel that they are not authorized to use CPNI for any purpose other than routine invoicing without the specific approval of the owner/President, and has adopted an express disciplinary process for violations of this policy.
- (c) It is “Coupe’s” policy that CPNI shall not be used in any internal or external marketing campaign. Furthermore CPNI will not be disclosed or provided to third parties.
- (d) Coupe has instituted a supervisory review process regarding compliance with the rules of this subpart. Should “Coupe” enact any outbound marketing, supervisory approval of proposed outbound marketing must be obtained from the owner/President and records shall be kept for a minimum of one year.
- (e) “Coupe” acknowledges it must provide opt-out mechanisms for its clients and written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. Such notice shall conform to requirements of CFR 47 Part 64.2009.