



Writer's Direct Dial: 703.755.6730
Facsimile Number: 703.755.6740
Sheba.Chacko@bt.com

March 2, 2009

VIA ELECTRONIC SUBMISSION
(<http://www.fcc.gov/cgb/ecfs>)

and

BY COURIER

The Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: **Annual 64.2009(e) CPNI Certification for 2009
EB Docket 06-36**

**BT Americas Inc.
FCC Form Filer ID 809483**

**Radianz Americas Inc.
FCC Form Filer ID 823182**

**BT Conferencing Video Holdings Inc.
FCC Form Filer ID 827277**

**BT Conferencing Inc.
FCC Form Filer ID 821924**

**BT LatAm Corp.
FCC Form Filer ID 825498**

**BT LatAm Inc.
FCC Form Filer ID 821680**

I, A. Sheba Chacko, certify that I am an officer of the companies named above (hereinafter referred to as "BTA"), and acting as an agent of BTA, that I have personal knowledge that they 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.*

The Secretary
Federal Communications Commission
March 2, 2009
Page 2

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

BTA has not taken any actions against data brokers in the past year

BTA has not received any customer complaints in the past year concerning the unauthorized release of CPNI .

Respectfully submitted,

BT AMERICAS INC.
BT CONFERENCING VIDEO HOLDINGS INC.
BT CONFERENCING INC.
BT LATAM CORP.
BT LATAM INC.
RADIANTZ AMERICAS INC.



By _____
A. Sheba Chacko

cc: Best Copy and Printing, Inc.
445 12th Street, Suite CY-B402
Washington, DC 20554

Attach: Statement of Compliance

Statement on CPNI Compliance

BT Americas Inc., Radianz Americas Inc., BT Conferencing Inc., BT Conferencing Video Holdings Inc., BT LatAm Inc. and BT LatAm Corp. (hereinafter collectively referred to as “BTA”) provides exclusively to its customers global information communications technology services that include information, systems integration services, consulting and “telecommunications”, but not “telecommunications services”, as those terms are defined in sections 3(20), 3(43) and 3(46), respectively, of the Communications Act or common carrier services. Therefore, BTA is not a “telecommunications carrier”, as that term is defined in section 3(44) of the Act. The certification requirement in section 64.2009(e) of the Commission’s Rules applies by its terms exclusively to a “telecommunications carrier.” Because BTA is not a “telecommunications carrier”, section 64.2009(e) does not apply to its operations.

For the additional information of the Commission, BTA, which serves only large global enterprises, does not use any information that would be considered to be CPNI if BTA provided “telecommunications services” except in the provision or marketing of services among the category of service to which a customer already subscribes.

- BTA serves large multinational customers who negotiate stringent contract terms regarding the protection and use of their customer data and which customers are serviced by dedicated account representatives .
- BTA may, pursuant to the express affirmative consent of the customer as set forth in a customer contract, provide services jointly with affiliates or a third party.
- BTA personnel are trained to protect the confidential information of its customers.
- Employees, agents and subcontractors of BTA are required to undergo training regarding the use and access of customer data as embodied in the EU data protection directives and the FCC’s CPNI rules that would be applicable to BTA if it operated as a telecommunications services provider in the U.S.
- Employees, agents, subcontractors and joint venture partners are required to execute confidentiality and nondisclosure commitments
- BTA does not provide telephone exchange services and therefore is not subject to the CPNI requirements that relate to telephone exchange services.
- BTA did not use data brokers in 2008 nor has it received any customer complaints in 2008 regarding unauthorized release of CPNI.
- No breaches occurred in 2008 that required BTA to notify law enforcement under the applicable CPNI rules. Should a breach occur, BTA has established policies and procedures that comply with the FCC’s CPNI rules and BTA’s CFIUS commitments.