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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 26, 2009

Name of company covered by this certification: Grid4 Communications

Form 499 Filer ID: 825112

Name of signatory: Douglas Black

Title of signatory: Vice President

I, Douglas Black, certify that I am an officer of the company named above, and acting as an agent of 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/ is not] 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, 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 has 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 Douglas Black February 26, 2009

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List A B C D E



GRID4 COMMUNICATIONS CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

Grid4 Communications understands the need for privacy and the responsibility to protect our customer's account information. We have in place the following business practices to safeguard our customer's information:

- A customer's request for account information must come from an authorized company contact, Information is only provided to account level authorized contact. A list of company authorized contacts are obtained from the customer and updated as new information is provided by them
- New employees are instructed on the importance and security of customer information. Likewise, existing employees receive updated training which includes information on how to deal with customer information
- Access to customer information is limited to only those employees who require it perform their duties. Access is password restricted
- Grid4 has never participated in the business practice of providing its customer's information, for a profit or otherwise, to outside parties for the purpose of marketing
- Online access to customer information is available only through a secure site which requires login information to access
- If an employee is contacted by a customer who believes their proprietary information has been shared, employees are instructed to immediately contact their department Vice President. An investigation will take place