

MAR - 9 2009

FCC Mail Room

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 2, 2009

Name of company(s) covered by this certification: Crystal Clear Communications

Form 499 Filer ID: 815434

Name of signatory: Michael Kobriger

Title of signatory: COO

I, Michael Kobriger, 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 in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules [attach accompanying statement].

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.

If affirmative: [Provide explanation of any actions taken against data brokers]

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).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed Michael Kobriger

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Crystal Clear Communications

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Received & Inspected

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CPNI Certification Procedures—EB Docket No. 06-36

- New customers submit information to Crystal Clear Communications via mail or secured fax
- All customers are set-up with a password of their choice or default through business EIN number
- After information is received, it is downloaded onto a password protected internal database which is not link to an outside server and has no internet connection
- Data is kept for a limited time then archived internally
- Customer data/information will not be released with out written notification and password verification
- Credit card information is not stored on site
- All employees sign a *Non-Circumvention, Non Disclosure, Confidentiality Agreement*