

EXHIBIT FILE COPY ORIGINAL

Received & Inspected

MAR 2 2009
FCC Mail Room

CERTIFICATION OF CPNI FILING DATED DECEMBER 31, 2008

EB-06-TC-060

On behalf of **Network Innovations, Inc.** and in accordance with Section 64.2009(e) of the Commission's Rules, I hereby certify that I have personal knowledge that **Network Innovations, Inc.** has established operating procedures that are adequate to ensure compliance with the rules in Section 64.2009.

Further, I hereby certify that the attached statement explaining how the company's operating procedures ensure compliance with Section 64.2009 is true and correct.

Dated this 26th day of February, 2009.

Network Innovations, Inc.

By: _____

Rick A. Stern

Name: Rick A. Stern

Title: President / CEO

Date: 2/26/09

No. of Copies rec'd 024
List ABCDE

Statement Concerning the Protection of Customer Proprietary Network Information for the Annual Period Ending December 31, 2007

Network Innovations, Inc. statement regarding Customer Proprietary Network Information

Network Innovations, Inc. does not release any information to third parties, unless required to do so by court order.

Network Innovations, Inc. does collect Customer Proprietary Information at the time of account inception.

Network Innovations, Inc. obtains customer information when receiving new orders.

In addition to collecting information via our order management system, we also gather necessary customer information over the phone as well as on customer order forms (applications for telecommunications services).

Telephone communications with customers are not recorded.

Persons calling into our support center are required to verify account specific information, before a representative will disclose account information.

Applications for service are stored in secured file cabinets which are off limits to other than authorized employees of Network Innovations, Inc. Network Innovations, Inc. customer support facility is a secured access facility and is operational 24 / 7 / 365.

All other customer information is stored electronically in our customer management system NI Vision, which is securely backed up in a remote storage facility on a daily basis. Access to the NI Vision is limited to key Network Innovations, Inc. employees only. Access to NI Vision is protected by user name and password security, additionally management limits users' access rights by login.

NI Vision Software and Network Innovations, Inc. uses off site servers, which are located in secure facilities only accessible by technicians with access cards. All electronic data transmissions between servers are encrypted. Firewalls are also present at all locations to prevent intrusion.

Network Innovations, Inc. uses a payment processing center to process paper payments; the payment-processing center is a Chase bank lock box facility. Chase provides Network Innovations, Inc. with a batch upload file that does not contain any customer proprietary information. Employees of the payment-processing center receive payments via a lockbox. All employees of the payment-processing center are background checked and not allowed to take any information out of the center with them.

Paper payments received directly by Network Innovations, Inc. are processed by a duly appointed staff member of our Accounting and Finance department, entered into our system, then immediately deposited into the main business account at Chase.

Network Innovations, Inc. sends out paper invoices on a monthly basis to customers. A vendor that is located in a secure facility not accessible to the public prints bills. All employees of the vendor are background checked. The vendor receives billing information

via batch files over an encrypted Internet connection. Batch files are stored on a secured server that is fire walled and password protected.

Customer data is often archived by Network Innovations, Inc. and its affiliates; archived information is stored on mass media and kept in secured facilities. Archived information is only available to authorized company personal.

Network Innovations, Inc. only uses customer information when necessary, and informs customers when it intends to do so, Customers sign a letter of authorization which informs the customer of when such information will be released and for what purpose.

Network Innovations, Inc. does not use customer information for marketing.

Network Innovations, Inc. uses customer information to determine credit worthiness and to order services from the Carrier. Network Innovations, Inc. obtains credit information from customers either directly, via Equifax, and or through Dunn and Bradstreet. Only authorized employees of Network Innovations, Inc. have access to the credit system and access is monitored and controlled by management.

Credit checks and denials are processed in accordance with state and federal laws as well as Network Innovations, Inc. internal approval process.

Network Innovations, Inc. orders services via a secured application provided by the Carriers Network Innovations, Inc. does business with. The application(s) is user name and password protected Carrier and Network Innovations, Inc. control access.

Network Innovations, Inc. cannot speak to the Carriers' policies regarding customer information. Network-Innovations, Inc. does request that customers be excluded from marketing lists when submitting orders. Network Innovations, Inc. also requests that customers' information is not provided to non essential personal or any third party vendors.