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March 26, 2009

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Office of the Secretary
Federal Communications Commission
Attn: Enforcement Bureau – Telecommunications Consumers Division
445 12th Street, SW
Washington, DC 20554

Ms. Marcy Greene, Deputy Chief
Federal Communications Commission
Attn: Enforcement Bureau – Telecommunications Consumers Division
445 12th Street, SW
Washington, DC 20554

Re: Omnibus Notice of Apparent Liability for Forfeiture (“NAL”)
Annual 64.2009(e) CPNI Certification
Net Tel, LLC
NAL Account No. 200932170573

Dear Office of the Secretary and Ms. Greene:

Please accept this letter in response to the above-referenced NAL.

Net Tel, LLC (the “company”) respectfully requests that the Enforcement Bureau cancel the forfeiture, or in the alternative, reduce the forfeiture, based upon the following:

1. The NAL was issued against companies that failed to submit an annual customer proprietary network information (“CPNI”) compliance certificate for the 2007 calendar year. The Company did file its compliance certificate on or about September 26, 2008. The compliance certificate complied with the FCC Order, and contained a compliant attestation. The Company is in substantial compliance with the rules, and that the failure to file was an unfortunate paperwork error. Since the Company is in substantial compliance, the forfeiture should be cancelled or reduced to levels at or below those of companies that filed but had deficient paperwork from which compliance cannot

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be determined (\$4000), or those that failed to sign the attestation of compliance (\$2000). Please also note that the Company has the same management team, and substantially the same ownership as ILDN West, LLC (NAL Account No. 200932170954), therefore, any forfeiture, if any, that should be deemed proper, should be reduced by one half.

2. In addition, the Company did file its compliance certificate for the 2008 calendar year on a timely basis.

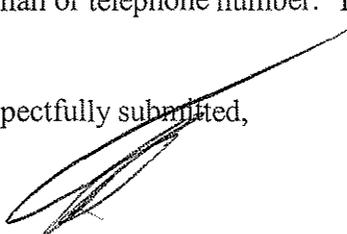
3. The Company resells both Origination and Termination of voice services only to other Carriers. ("Carrier to Carrier business only"). The Company receives the calls from carriers (which are all calling card providers) and extend the call to the destination country for termination. All of the calls are calling card related and our company does not have any knowledge nor any contact with any end user(s). While the Company has access to the calling party and called party telephone numbers and call duration, the Company has no way to link that data to the accounts or identities of specific individuals.

4. The compliance certificates filed by the Company included an outline of the Company's procedures to comply with Commission's Order in CC Docket No. 96-115 released on April 2, 2007. In addition, The Company has never taken any actions against data brokers, nor has it ever received any customer complaints concerning the unauthorized release of CPNI.

5. The Company is current in its FCC 499 filings, as well as its contributions for Local Number Portability ("LAP"), North American Numbering Plan ("NAN"), Telecommunications Relay Services ("TRS").

If you have any questions or if I may provide you with additional information, please contact me at the above address, e-mail or telephone number. Thank you for your attention to this matter.

Respectfully submitted,



Lance J.M. Steinhart
Attorney for Net Tel, LLC

Enclosures