



a First Communication Inc company

January 20, 2010

Ms. Marlene H. Dortch
Office of Secretary
Federal Communication Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket 06-36/Annual Certifications and Accompanying Statement for 2009

Dear Ms. Dortch,

Pursuant to section 64.2009(e) of the Commission's rules 1 and the Commission Public Notice DA 10-91, dated January 15, 2010, in the above captioned manner, Globalcom, Inc hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

Should you have any questions or require additional information regarding this matter, please do not hesitate to contact me at the number below.

Respectfully,

A handwritten signature in cursive script that reads "Mary Cegelski".

Mary Cegelski
Manager of Regulatory Affairs
Globalcom, Inc.
Telephone (216) 468-1614
Fax (216) 468-1680
mcegelski@firstcomm.com

cc: Best Copy and Printing, Inc
Via e-mail: fcc@bcpiweb.com

Annual 47 C.F.R. § 64.2009(e)
CPNI Certification Template
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: **January 21, 2010**
2. Name of company(s) covered by this certification: **Globalcom, Inc**
3. Form 499 Filer ID: **820144**
4. Name of signatory: **Joseph R. Morris**
5. Title of signatory: **Chief Operating Officer**
6. Certification:

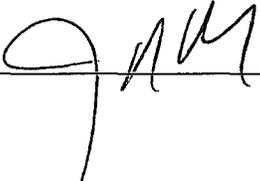
I, **Joseph R. Morris**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, 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. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, 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.]

The company represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Attachment A

Customer Proprietary Network Information Policy

Globalcom, Inc has established policies and procedures to satisfy compliance with the Federal Communications Commission's ("FCC's") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in sections 64.2001 et seq. Globalcom, Inc takes steps to secure the privacy of all of its customers' information, as evidenced by the Privacy Policy posted on its website and the specific policy regarding the use of CPNI.

This attachment summarizes the steps taken by Globalcom, Inc to implement its CPNI policy.

- Globalcom, Inc has a company manual that details how employees are expected to treat any confidential information.
- All employees are required to sign the company manual as a condition of employment.
- All customer information is maintained in a password protected database that can be accessed only by authorized employees.
- Authorized Globalcom, Inc employees may access CPNI to address customer questions only when the person calling provides the correct password or is listed as an "authorized contact" for the business customer.
- Globalcom, Inc requires prior written approval from customers for any information disclosed to a third party, except to the extent the disclosure is required for the purpose of the agreement.
- Globalcom, Inc's contracts require the company to have protective non-disclosure agreements in place with any third parties involved in the provision of a customer's private line service prior to any disclosure.
- Globalcom established passwords and reminder questions for all new customers and all customers requesting call detail information once positive verification is obtained.
- Globalcom notifies all customers when there is a change of the password, reminder question or answer, the address of record or the on-line access information.
- In accordance with Globalcom' policy, Globalcom does not use for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. Globalcom also may use CPNI as required to render services and to bill for such services. Globalcom does not share CPNI with affiliates.