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# TROUTMAN SANDERS

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February 5, 2010

## VIA U.S. MAIL AND ELECTRONIC COMMENT FILING SYSTEM

Ms. Marlene H. Dortch  
Office of the Secretary, Federal Communications Commission  
455 12th Street, SW  
Washington, DC 20554

**Re: Certification of CPNI Filing, EB Docket No. 06-36**

Dear Ms. Dortch:

This firm represents Parker FiberNet, LLC ("Parker FiberNet"). Parker FiberNet hereby submits its 2009 CPNI compliance certificate and a statement explaining how Parker FiberNet's operating procedures ensure compliance with the referenced regulations.

Please feel free to contact me if you have any questions regarding the attached.

Sincerely,



Benjamin A. Gastel

Enclosure

cc: Enforcement Bureau, Telecommunications Division  
Best Copy and Printing, Inc. (via email - [FCC@bcpiweb.com](mailto:FCC@bcpiweb.com))  
David Parker, Parker FiberNet, LLC

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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 2009

Date filed: February 5, 2010

Name of company covered by this certification: Parker FiberNet, LLC

Form 499 Filer ID: 0006073647

Name of signatory: David Parker

Title of signatory: Manager

I, David Parker, 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 applicable requirements of 47 C.F.R. § 64 Subpart U – Customer Proprietary Network Information (“CPNI”).

Attached to this certification is an accompanying statement explaining how the company’s procedures ensure that this company is 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.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Parker FiberNet, LLC

Signed



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**PARKER FIBERNET, LLC**

**Statement of CPNI Operating Procedures**  
**February 5, 2010**

1. Parker FiberNet, LLC ("Parker FiberNet") offers telephone, Internet, co-location, fiber, and related services to customers in Rome, Georgia (Floyd County) and Athens, Georgia (Clarke County). Parker FiberNet currently has 19 employees, 97 total customers (41 of which have telephone service), and generates approximately \$141,700 in monthly revenue.

2. Parker FiberNet resells voice telephone services from local exchange carriers. Parker FiberNet also provides modified interconnected voice over Internet protocol (VoIP) service to three of its customers.

3. Parker FiberNet's retail telephone customers primarily consist of business customers, although in some circumstances, its telephone customers will be individual customers.

4. Except for its three VoIP customers, Parker FiberNet receives all CPNI data directly from local exchange carriers, pursuant to its interconnection agreements with these entities, solely for the purpose of billing its customers.

5. Use of CPNI.

a. *Billing purposes.* Parker FiberNet has engaged an independent contractor to perform billing services that are necessary to the provision of service to Parker FiberNet's customers. Parker FiberNet shares CPNI data with this billing agent only to the extent necessary for generating bills for its customers. All such disclosure of CPNI data is subject to a mutual confidentiality provision contained in the agreement between Parker FiberNet and its billing agent.

b. *Marketing or other purposes.* Except as listed in Section 5(a), Parker FiberNet does not release any CPNI data to any third party or agent, including joint venture partners or independent contractors, without an affirmative written request by the customer. Parker FiberNet does not engage in any marketing campaigns which utilize CPNI data.

4. Notification of CPNI security breaches. In the past year, Parker FiberNet has not discovered and is not aware of any breaches of its customers' CPNI. In the event that Parker FiberNet discovers any breaches of its customers' CPNI, it will maintain records of such breaches and comply with all applicable notification requirements contained in 47 C.F.R. §§ 64.2001 – 64.2011.

5. Customer access to CPNI data.

- a. *Telephone access.* Parker FiberNet does not disclose any of its customers' call detail information or other CPNI data over the telephone, regardless of whether its customers have initiated the telephone contact.
- b. *Online access.* Parker FiberNet does not offer any form of online access to its customers' service accounts. Parker FiberNet's customers therefore have no means to access CPNI data online.
- c. *In-store access.* Parker FiberNet does not have any retail locations and therefore does not provide in-store access to CPNI data.

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