

**United Prepaid Network, Inc.**

**Annual CPNI Certification**

**47 C.F.R. §64.2009(e)**

**EB Docket No. 06-36**

**OFFICER: Patrick Moriarty**

**TITLE: President & CEO**

I, Patrick Moriarty, hereby certify that I am an officer of United Prepaid Network, Inc. ("United Prepaid Network") and that I am authorized to make this certification on behalf of United Prepaid Network. I have personal knowledge that United Prepaid Network has established operating procedures that are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to United Prepaid Network or to any of the information obtained by United Prepaid Network. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures United Prepaid Network employs to ensure that it complies with the requirements set forth in §64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to United Prepaid Network or to the information obtained by United Prepaid Network.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

*PM*  
2/16/10

**United Prepaid Network, Inc.**  
**Statement of CPNI Procedures and Compliance**

United Prepaid Network, Inc. ("United Prepaid Network") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, United Prepaid Network does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. United Prepaid Network does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. United Prepaid Network typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

United Prepaid Network may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because United Prepaid Network provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by United Prepaid Network is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

United Prepaid Network safeguards from improper use or disclosure by employees the call detail information that United Prepaid Network obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, United Prepaid Network has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to United Prepaid Network computers and call detail records. In the event of unauthorized CPNI access, United Prepaid Network will notify the requisite law enforcement agencies, and the customer when possible.

United Prepaid Network did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because United Prepaid Network does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through United Prepaid Network, it cannot notify those end-user customers directly if a breach occurs. However, United Prepaid Network has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.