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February 23, 2010

**VIA ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Re: Annual Customer Proprietary Network Information Compliance  
Certification; EB Docket No. 06-36

Dear Secretary Dortch:

Attached please find the 2010 Annual Customer Proprietary Network Information  
("CPNI") Compliance Certification for ADMA Telecom, Inc.

Please feel free to contact me if you have any questions regarding this filing.

Respectfully Submitted,



Denise N. Smith

*Counsel for ADMA Telecom, Inc.*

Attachment

cc: Best Copy and Printing, Inc. (via e-mail)

**Annual Customer Proprietary Network Information Certification**  
**Pursuant to 47 C.F.R. § 64.2009(e)**  
**EB Docket No. 06-36**  
February 2010

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

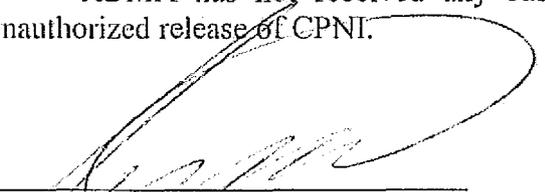
Name of Company: ADMA Telecom, Inc.  
Form 499 Filer ID: 826102  
Name of Signatory: Andres Proano  
Title of Signatory: Chief Financial Officer

I, Andres Proano, certify that I am an officer of ADMA Telecom, Inc. ("ADMA"), and acting as an agent of ADMA, that I have personal knowledge that ADMA 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 ADMA's procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

ADMA has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. ADMA has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

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

  
\_\_\_\_\_  
Andres Proano  
Chief Financial Officer  
ADMA Telecom, Inc.

Date: 2/22/2010

## Customer Proprietary Network Information Certification Attachment A

ADMA has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

### Safeguarding against pretexting

- ADMA takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. ADMA is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### Training and discipline

- ADMA trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out ADMA's obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, (d) obtain customers' informed consent as required with respect to its use for marketing purposes, and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.
- ADMA employees are required to review ADMA's CPNI practices and procedures and to acknowledge their comprehension thereof.
- ADMA has a disciplinary process in place for violation of the company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

### ADMA's use of CPNI

- ADMA may use CPNI for the following purposes:
  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
  - To market services formerly known as adjunct-to-basic services; and
  - To market additional services to customers *with the receipt of informed consent via the use of opt-in or out-out, as applicable.*
- ADMA does not disclose or permit access to CPNI to track customers that call competing service providers.

- ADMA discloses and permits access to CPNI where required by law (*e.g.*, under a lawfully issued subpoena).

#### Customer approval and informed consent

- ADMA does not use CPNI for marketing purposes. ADMA also does not share, sell, lease, or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any third parties for any type of service marketing purposes. If ADMA changes this policy, it will implement a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
- **One time use**

After authentication, ADMA may use oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice will comport with FCC rule 64.2008(f).

#### Additional safeguards

- All marketing campaigns must receive prior approval from a supervisor and must be conducted in accordance with this policy. ADMA maintains for at least one year records of all marketing campaigns.
- ADMA designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- For customer-initiated telephone inquiries regarding or requiring access to CPNI, ADMA will not disclose call detail information to a customer. ADMA only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- ADMA does not provide customers with online access to CPNI, nor does it have retail locations where the customer may request access to CPNI.
- Because ADMA exclusively sells prepaid calling cards, ADMA does not maintain billing addresses or customer account information such as customer name or passwords. Therefore, it is not possible to make certain account changes for which notification would be required under the FCC's rules.
- In the event of a breach of CPNI, ADMA will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. If they can be identified, customers will be notified after the seven (7) day period, unless the relevant investigatory party directs ADMA to delay notification, or ADMA and the investigatory party agree to an earlier notification. ADMA will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers (if they can be determined).