



March 1, 2010
Via ECFS

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

RE: EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2009 ACN Communication Services, Inc.	Filer ID 820854
and ACN Communication Services Virginia, LLC	Filer ID 826231
and ACN Digital Phone Service, LLC – Form 499	Filer ID 826006
and ACN Digital Phone Service Puerto Rico, LLC	Filer ID 827173

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of ACN Communication Services, Inc. and its affiliates as listed above. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to ACN Communication Services, Inc.

Attachments

cc: Best Copy and Printing (via email to FCC@BCPIWEB.COM)
J. Mueller, ACN
file: ACN- FCC CPNI
tms: FCCx2010-1

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2009

Date Filed: March 1, 2010

Name of Companies covered by this certification:

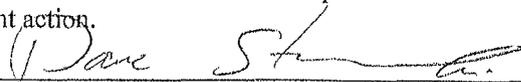
ACN Communication Services, Inc.	Form 499 Filer ID: 820854
ACN Communication Services Virginia, LLC	Form 499 Filer ID: 826231
ACN Digital Phone Service, LLC	Form 499 Filer ID: 826006
ACN Digital Phone Service Puerto Rico, LLC	Form 499 Filer ID: 827173

Name of Signatory: David Stevanovski

Title of Signatory: President

I, David Stevanovski, certify and state that:

1. I am the President of ACN Communication Services, Inc., ACN Communication Services Virginia, LLC, ACN Digital Phone Service, LLC and ACN Digital Phone Service Puerto Rico, LLC (collectively known as "the ACN Companies") 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.*
2. Attached to this certification, as Exhibit A, 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.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. 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.



David Stevanovski, President
ACN Communication Services, Inc.
ACN Communication Services Virginia, LLC
ACN Digital Phone Service, LLC
ACN Digital Phone Service Puerto Rico, LLC

3/1/10

Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

ACN Communication Services, Inc.
And
ACN Communication Services Virginia, LLC
And
ACN Digital Phone Service, LLC
And
ACN Digital Phone Service Puerto Rico, LLC

Calendar Year 2009

Attachments: Exhibit A - Statement of CPNI Procedures and Compliance
Explanation of actions taken against data brokers – not applicable
Summary of customer complaints – not applicable

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

ACN Communication Services, Inc.
And
ACN Communication Services Virginia, LLC
And
ACN Digital Phone Service, LLC
And
ACN Digital Phone Service Puerto Rico, LLC

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

ACN Communication Services, Inc., ACN Communication Services Virginia, LLC, its Virginia operating subsidiary, ACN Digital Phone Service, LLC, and ACN Digital Phone Service Puerto Rico, LLC (collectively known as "The ACN Companies" or "Companies") provide the following as its Statement of CPNI compliance.

ACN Communication Services, Inc. and ACN Communication Services Virginia, LLC provide wireline local and long distance telecommunication services to business and residential customers, primarily as a bundled service. ACN Digital Phone Service, LLC and ACN Digital Phone Service Puerto Rico, LLC, provide Voice over Internet Protocol ("VoIP") services and customer premises equipment to business and residential customers. All of The ACN Companies have the same methods and procedures and operating policies with respect to CPNI and customer call detail records.

The ACN Companies do not use CPNI to market services to their customers. Therefore, the ACN Companies do not utilize the opt-in or opt-out approval processes.

The ACN Companies bill customers directly and have taken steps to secure CPNI and manage its release in accordance with FCC rules. The ACN Companies have instituted processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI. Customer Service Agents are trained how to verify customers when hired and continually coached on safeguarding customer CPNI.

User account information can only be accessed by authorized representatives of the ACN Companies. Such authorized representatives have access to customer records management systems only via an established password protected account setup in their name by a system administrator. When the ACN Companies agents take action on a customer's account (e.g. make package changes, billing changes, wrap codes, create cases, etc.) an audit log is created on the account with respect to the actions the agent took on the customer's account. Additionally, access to CPNI used for the purpose of reporting and managing the business is centralized to individuals who have limited password access to customer information through the establishment of a Business Objects database that is populated only with specified customer information.

ACN Communication Services, Inc.
And
ACN Communication Services Virginia, LLC
And
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And
ACN Digital Phone Service Puerto Rico, LLC

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE
(Page 2)

Call detail information is provided to customers over the telephone pursuant to the following procedures identified below. Customers define an account User Name and Password at the time the customer account is established. In addition, each Customer must select a secret question and answer upon establishment of an account. Should a customer forget or lose the password, such information can be provided to the customer at the email address established when the account was set up. If the customer cannot provide the password or backup authentication question response, and the customer question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by mail to the customer's address of record, email or by calling the customer at the telephone number of record.

The ACN Companies maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The ACN Companies protect against the unauthorized disclosure of CPNI on the internet through the establishment of a customer username and password. In addition, each Customer must select a secret question and answer upon establishment of an account. Should a customer forget or lose the password, such information can be provided to the customer at the email address established when the account was set up. If the customer cannot provide the password or backup authentication question response then the customer can contact customer service. Upon the customer's contact with the ACN Companies' customer service department regarding a forgotten password or user name, the customer must provide their email address of record prior to the customer service representative emailing the customer their username and password.

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STATEMENT OF CPNI PROCEDURES AND COMPLIANCE
(Page 3)

The ACN Companies do not have retail locations and therefore does not disclose CPNI in-store.

The ACN Companies notify customers via a previously established email address, telephone call or mail to the customer address of record, notifications regarding account changes.

The ACN Companies have not taken any actions against data brokers in the last year.

The ACN Companies have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The ACN Companies maintain a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The ACN Companies have not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The ACN Companies have not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.