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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:

March 1, 2010

Name of company covered by this certification:

Unity Business Networks, LLC

Form 499 Filer ID:

824906

Name of signatory:

Derek Hodovance

Title of signatory:

VP Operations

I, Derek Hodovance, 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 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, 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).

Please note: The Unity Business Network customer base was sold in October of 2009. This will be the last CPNI certification letter submitted by Unity Business Networks. The responsibility for CPNI is now in the hands of Telesphere Networks who file their own certification letter.

Signed



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§ 64.2009 Safeguards required for use of customer proprietary network information.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

(c) All carriers shall maintain a record, electronically or in some other manner, of their sales and marketing campaigns that use CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign. Carriers shall retain the record for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

(c) Customer proprietary network information (CPNI).

(1) Customer proprietary network information

(CPNI) is: (i) Information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the customer- carrier relationship; and (ii) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.



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Unity's operating procedures ensure that it is compliant with the rules in this subpart.

- A. Access to CPNI is limited to Operations and Billing departments. This information is used for troubleshooting and billing purposes only.
 - a. For a sales and/or marketing person to obtain CPNI – the individual would have to obtain the data through the Chief Technical Officer (CTO) on a case by case basis. This would also be a “one-time” access to the data.
 - b. Access and use of CPNI, and the express disciplinary process for it's misuse fall under the Intellectual Property and Communications Systems sections of the Unity Employee Handbook. Any violation of these guidelines may result disciplinary action up to and including termination of employment.
- B. All outbound marketing campaign information is stored electronically for greater than 1 year.
- C. All outbound marketing campaigns require the approval of the CEO of the company, regardless of their use of CPNI.
- D. To date, Unity has never used CPNI for a marketing campaign. In fact we've not had a marketing campaign that targets our existing customer base.