

May 5, 2010

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

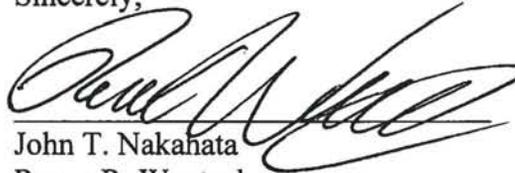
**RE:** *Revised Annual 47 C.F.R. § 64.2009(e) CPNI Certification in EB Docket 06-36*

Dear Ms. Dortch:

Janaslani Enterprises, LLC, by its undersigned attorney, hereby resubmits its Annual CPNI Certification for 2009 and its accompanying statement of compliance, in EB Docket No. 06-36, revised to eliminate the need for confidential treatment.

Any questions about this filing may be directed to the undersigned.

Sincerely,



John T. Nakahata  
Renee R. Wentzel  
*Counsel to Janaslani Enterprises, LLC*

Attachment

cc: Best Copy and Printing, Inc. via e-mail to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Revised Annual 64.2009(e) CPNI Certification for 2009

Date filed: January 11, 2010 (revised May 4, 2010)<sup>1</sup>

Name of company covered by this certification: Janaslani Enterprises, LLC

Form 499 Filer ID: 825536

Name of signatory: Edwin Janaslani

Title of signatory:

I, Edwin Janaslani, 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 ensured that the company was and 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 the company at state commissions, the court system, or the Commission against data brokers) during the period covered by this certification.

The company has not received any customer complaints during the period covered by this certification concerning the unauthorized release of CPNI.

Signed

  
Edwin Janaslani

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<sup>1</sup> Revised to eliminate confidential material in the attachment filed January 11, 2010.

**2009 Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

**Attachment 1: Statement Concerning Company Procedures**

Janaslani Enterprises, LLC (Janaslani Enterprises) does not use CPNI for marketing purposes. Janaslani Enterprises sells prepaid telecommunications products over the Internet.

During 2009, Janaslani Enterprises had in place numerous mechanisms to ensure that CPNI, including customer call detail information, was safeguarded.

For Janaslani Enterprises products for which Janaslani Enterprises maintains call detail records, employee access to that call detail information is restricted and monitored. Furthermore, Janaslani Enterprises instructs its staff not to disclose call detail information or passwords, except in accordance with specific authentication procedures. Employees are subject to discipline, including termination, for violations of Janaslani Enterprises' CPNI policies.

In addition, customers' access to call detail records is password protected, with credit card information verified and passwords and email address of record established at the time the customer initially establishes his or her account. Janaslani engages in numerous processes to authenticate customers both initially and when customers lose, forget, or wish to change their passwords. Customers are notified of changes in password, email address or billing information through their email address of record.

Finally, Janaslani Enterprises encrypts all of its call detail records and account information.