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Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

FEB 22 2010

Statement of Customer Proprietary Network Information
Form 499 Filer ID: 826390

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Confidentiality and Security

- We limit access to company information to employees who we believe reasonably need to come into contact with that information to provide products or services in order to do their jobs.
- We have physical, electronic, and procedural safeguards that comply with federal regulations to protect company information.
- Employees are authorized to access Customer Information for business purposes only. Our employees are bound by a code of ethics that requires confidential treatment of Customer Information and are subject to disciplinary action up to and including termination of employment and criminal action if they fail to follow this code
- All company information is housed in secured databases with multiple firewalls and security access authorized through administrative overview.
- Customers are authorized to access only their company information through Accela Inc.'s secured interface. In addition, notifications of account changes are sent via e-mail to customer's registered contacts immediately and all changes are documented and tracked on a separate company database.
- Verbal access is only allowed by authenticating the customer via a password on a customer initiated contact.

Security Breaches

- In the event a security breach occurs, law enforcement will be notified as soon as practicable and no later than 7 business days following the security breach. Customer will not be notified and disclosed of breach until following notification to USSS and FBI unless there is an extraordinary need to notify customer is determined. All breaches will be documented and recorded for a minimum of two years.

Information Sharing and Disclosure

- Accela does not rent, sell, or share company information about you with other people or nonaffiliated companies except to provide products or services or under the following circumstances:
 - We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
 - We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Accela's terms of use, or as otherwise required by law.
 - We transfer information if Accela is acquired by or merged with another company. In this event, Accela will notify customers before information is transferred and becomes subject to a different privacy policy.
 - In the event that Accela, Inc. releases any customer information other than for ordinary business use, customer approval will be established in writing prior to the release of information.

Sales and Marketing Use

Record of release of information for sales and marketing use must be pre-approved by administrative management and will be documented and saved electronically; records will include information of campaign and what products and services were offered for a term of at least one year.



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Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 10, 2010

Name of company covered by this certification: Accela, Inc.

Form 499 Filer ID: 826390

Name of signatory: Ann Jensvold

Title of signatory: CFO

I, Ann Jensvold, 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 see attached accompanying statement.

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).

I declare under penalty of perjury that all statements contained in this form and any accompanying documents are true and correct to the best of my knowledge.


Ann Jensvold

02/10/10
Date