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January 5, 2011

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby – TW-A325
Washington, D.C. 20554

**Re: Erratum - AT&T Annual CPNI Compliance Certifications Calendar Year
2009; EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.2009(e), AT&T, hereby submits an erratum to its annual CPNI compliance certifications for calendar year 2009 (filed March 1, 2010). With this filing, AT&T includes the inadvertently omitted page 2 of the explanatory statement for David Christopher, one of its certifying officers. AT&T also provides one (1) copy of this erratum to Best Copy and Printing via email.

Should you have any questions, feel free to contact me.

Sincerely,

/s/ Anisa A. Latif

Anisa A. Latif

Attachment

**2009 CPNI Certification
Marketing, AT&T Mobility and Consumer Markets**

Date: _____

1/29/10

1. I, David Christopher, Chief Marketing Officer for AT&T Mobility and Consumer Markets, ("Responsible Business Unit") hereby certify, based upon my own personal knowledge or the personal knowledge of AT&T subject matter experts upon whom I have reasonably relied in making this certification, that the statements and information contained herein are accurate and complete. In making this certification, I have made a reasonable and diligent inquiry into the facts, including discussions with AT&T subject matter experts and a review of all necessary supporting documentation, either conducted by myself or by persons acting under my direction and control.

2. In accordance with the requirements of 47 C.F.R. §64.2009(e), I certify that as of December 31, 2009, the Responsible Business Unit for which I am accountable has established safeguards and operating procedures designed to ensure compliance with the requirements set forth in Subpart U-Customer Proprietary Network Information of the FCC's rules, 47 C.F.R. § 64.2001 et. seq. (the "FCC's CPNI rules").

3. I further certify that I am not aware of any known instances of non-compliance with the above requirements that have not been (i) corrected; or (ii) otherwise disclosed in this certificate.

Signature: _____



David Christopher, Chief Marketing Officer, AT&T Mobility and Consumer Markets

AT&T MOBILITY & CONSUMER MARKETS
EXPLANATORY STATEMENT OF CPNI COMPLIANCE 2009

In accordance with Section 64.2009(e) of the CPNI rules, I, David Christopher, Chief Marketing Officer – AT&T Consumer and Mobility Markets, provide the following explanation of the operating procedures adopted by Consumer and Mobility Markets Marketing Organization (“My Organization”) which are intended to ensure compliance with 47 C.F.R. Part 64 Subpart U-Customer Proprietary Network Information. This statement summarizes these procedures and explains how these procedures were designed to ensure compliance with the CPNI rules.

A. Customer CPNI Approvals. My Organization has:

1. Established processes and controls preventing the use of, disclosure of, or access to CPNI to market service offerings that are not within a category of service to which the customer already subscribes from AT&T Mobility or its affiliates (“out-of-category services”) unless customer approval is obtained or such access, use, or disclosure is permitted under the FCC’s rules without customer approval. Those processes and controls include the review of list pulls and outbound marketing campaigns to ensure that CPNI rules are followed before those campaigns are launched. See 47 C.F.R. § 64.2005 and § 64.2007(b).

2. Established processes and controls to manage the development, approval and delivery of legally required notices to customers, including CPNI opt-out notices. See 47 C.F.R. § 64.2008(a)-(d). These processes and controls include a review and approval process for any change in content or distribution method for initial CPNI Rights Notifications and Biennial CPNI Rights Notifications. These processes and controls also include dedication of specific job functions to manage CPNI for My Organization and the establishment of procedures to direct the development of new processes within My Organization when CPNI rules are modified by the Federal Communications Commission.

3. Established processes and controls to appropriately disclose and provide access to CPNI for the purpose of marketing communications-related services by AT&T’s agents

and affiliates that provide communications-related services. See 47 C.F.R. § 64.2007(b). These processes and controls include an annual notice sent to vendor agents involved in marketing and/or fulfillment of CPNI Rights Notifications reminding them of their obligations to ensure the confidentiality and proper use of all such information.

B. Training and Disciplinary Policy. Processes and controls are in place in My Organization that:

1. Require all employees to review and certify to AT&T's Code of Business conduct which includes general information regarding protection of customer records and system access policies. New employees are required to complete this training within 30 days of their start date. In addition, all employees who have access to customer data or who have outbound marketing responsibilities are required to complete specific CPNI training. Further, My Organization provides relevant employees information on CPNI and other privacy related issues through less formal education methods such as employee communications and meetings. See 47 C.F.R. § 64.2009(b).
2. Maintain a policy requiring compliance with the CPNI rules and advises in the CPNI training and in the Code of Business Conduct that any failure by any personnel to comply with the CPNI rules is subject to disciplinary action up to and including termination of employment, depending on the nature and severity of the non-compliance. See 47 C.F.R. § 64.2009(b).

C. Sales and Marketing Campaigns. My Organization:

1. Maintains a record, for at least one year, of all approved marketing campaigns, including a description of the campaign, the type of CPNI used, and the products and services offered that is maintained. See 47 C.F.R. § 64.2009(c).
2. Has established a supervisory review process for all outbound marketing campaigns to assure that all sales and marketing campaigns that propose to use CPNI are reviewed and approved. All proposed outbound marketing campaigns, requests for use of CPNI, and requests for marketing lists and customer data are submitted for review and require supervisory approval by the Customer Lifecycle Marketing group (for

campaigns to wireless-only customers) or the Database Marketing group (for campaigns to wireline-only and joint wireline/wireless customers). See 47 C.F.R. § 64.2009(d).

D. Security and Authentication. My Organization has:

1. Established processes and controls to notify the customer via U.S. mail when a password, back-up means of authentication for lost or forgotten passwords, an online account, or an address of record is created or changed and to ensure that the content and delivery of such notice is in accordance with 47 C.F.R. § 64.2010(f). See also 47 C.F.R. § 64.2003(b). Specifically, My Organization reacts to triggers from IT systems that notification must be sent via U.S. mail (for all segments except Online and Mobility transactions). My Organization manages the content and postal delivery of such notifications and validates by reviewing customer counts, notification types, and postal receipts from the fulfillment vendor. (Other organizations manage notifications by means other than U.S. mail).
2. Established processes and controls to ensure that customer-initiated CPNI complaints or breaches, as “breach” is defined in 47 C.F.R. § 64.2011(e), are reported to AT&T Asset Protection for investigation and resolution and for complaint tracking and breach reporting purposes. See 47 C.F.R. § 64.2011. My Organization also, at the direction of Regulatory Compliance and Asset Protection, manages the fulfillment of customer breach notifications by mail when such notifications are required.
3. Established corrective processes to detect and cure potential deficiencies in the implementation and maintenance of its CPNI operating procedures.