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JAN 3 1 2011

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Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 1/27/2011

Name of company(s) covered by this certification: Wholesale Network Services, Inc.

Form 499 Filer ID: 828210

Name of signatory: Marcello Anzalone

Title of signatory: Treasurer

I, Marcello Anzalone, Treasurer, 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. S: 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 against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____ 1/28/11

Marcello Anzalone

Treasurer

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JAN 3 1 2011

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Annual CPNI Compliance Certificate

Name of company covered by this certification: Wholesale Network Services, Inc.

Date: January 28, 2011

A. The company does not use CPNI for the purpose of marketing services offerings that are not within the category of service that the company provides to customers. The company may use CPNI to market services offerings within the same categories of services to which the customer already subscribes. The company has established a supervisory review and approval process that calls for records of such offerings to be maintained for a minimum of one year.

B. The company employs several internal operating processes and procedures to ensure compliance with the Commission's CPNI rules. The company requires that all relevant personnel are informed of and follow company approved procedures for authenticating customers before disclosing CPNI. The company administers an employee disciplinary program to ensure compliance with internal procedures. This program includes penalties for the violation of internal privacy protection procedures, including the potential termination of employees, when appropriate. The company has standardized processes for tracking and resolving customer complaints that relate to unauthorized access to CPNI and for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any reaches of customer CPNI.

C. The company maintains records for at least one year of their own, their agents' their affiliates', their joint venture partners' or their independent contractors' sales and marketing campaigns that use their customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. These records are maintained at the office of senior executives who authorized the campaign.

D. The company has a supervisory review process for outbound marketing situations. The supervisory review process requires that any proposed outbound marketing requests involving CPNI must be approved by a supervisor. These approvals must be maintained for a period of one year.

E. The company has not taken any actions against any individual or entity that unlawfully obtains. Uses, discloses or sells CPNI.

F. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

G. The company does not share CPNI with joint venture partners or independent contractors for marketing purposes.

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1/28/11

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JAN 31 2011

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Annual 47 C.F.R. S: 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 1/27/2011

Name of company(s) covered by this certification: Touchtone Communications, Inc.

Form 499 Filer ID: 823676

Name of signatory: Marcello Anzalone

Title of signatory: Treasurer

I, Marcello Anzalone, Treasurer, 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. S: 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 against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____ 1/27/2011

Marcello Anzalone

Treasurer

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JAN 3 1 2011

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Annual CPNI Compliance Certificate

Name of company covered by this certification: Touchtone Communications, Inc.

Date: January 27, 2011

A. The company does not use CPNI for the purpose of marketing services offerings that are not within the category of service that the company provides to customers. The company may use CPNI to market services offerings within the same categories of services to which the customer already subscribes. The company has established a supervisory review and approval process that calls for records of such offerings to be maintained for a minimum of one year.

B. The company employs several internal operating processes and procedures to ensure compliance with the Commission's CPNI rules. The company requires that all relevant personnel are informed of and follow company approved procedures for authenticating customers before disclosing CPNI. The company administers an employee disciplinary program to ensure compliance with internal procedures. This program includes penalties for the violation of internal privacy protection procedures, including the potential termination of employees, when appropriate. The company has standardized processes for tracking and resolving customer complaints that relate to unauthorized access to CPNI and for identifying, responding to, documenting and, as appropriate, notifying law enforcement and customers of any reaches of customer CPNI.

C. The company maintains records for at least one year of their own, their agents' their affiliates', their joint venture partners' or their independent contractors' sales and marketing campaigns that use their customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. These records are maintained at the office of senior executives who authorized the campaign.

D. The company has a supervisory review process for outbound marketing situations. The supervisory review process requires that any proposed outbound marketing requests involving CPNI must be approved by a supervisor. These approvals must be maintained for a period of one year.

E. The company has not taken any actions against any individual or entity that unlawfully obtains. Uses, discloses or sells CPNI.

F. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

G. The company does not share CPNI with joint venture partners or independent contractors for marketing purposes.

1/27/11

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