Certification of CPNI Filing

Dated: February 4, 2011

By

QuantumShift Communications, Inc.,
d/b/a VCOM Solutions

RE: EB-06-TC-060

STATEMENT OF JENNA BROWN

I, Jenna Brown, being the Director, Regulatory Affairs of QuantumShift Communications, Inc., d/b/a VCOM Solutions, a certified competitive local exchange carrier, hereby state that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in 47 CFR §§64.2009 (e). Pursuant to the instructions in subpart e, the attached statement explains how the company ensures it is in compliance with the rules.

Jenna Brown

Jenna Brown

February 4, 2011

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STATEMENT OF COMPLIANCE OF OPERATING PROCEUDRES

As a matter of course, the company provides each of its telecommunications customers with their rights to restrict the use of, the disclosure of, and access to their Customer Proprietary Network Information ("CPNI") as follows:

- A statement to that effect is provided at least once per year to all the company's telecommunications customers, and complies with §64.2008 rules set forth in Title 47 "Notice Required for Use of Customer Proprietary Network Information."
- In such statement, customers are given the choice to either "opt-in" or "opt-out."
- The information is submitted electronically to all customers.
- Since the company provides electronic billing and other electronic correspondence to its customers, the company has an agreement in place with each customer, whereby customers have consented to the electronic exchange of information between the company and itself.
- Pursuant to §64.2009, the company has a "place holder" in its computerized system that indicates whether or not the customer has consented to the use of its CPNI for purposes such as: access of CPNI to address customer-initiated billing inquiries, discussions of products and services for which the customer does not currently subscribe, but may be of use to them.
- Generally speaking, the company exercises the provisions contained under §64.2008 (f) "Notice Requirements Specific to One-Time Use of CPNI" in the day –to-day course of its business, and this is accomplished by oral notification. Due to the company's small customer base, and the nature of its overall operations, most telephonic exchange between the company and its customers is usually initiated by the customer (for example: to inquire about a bill, inquire about services, etc.).

- The company does not run advertising campaigns, nor does it have any affiliates who provide services other than those provided directly by the company. Additionally, the company does not attempt to sell services telephonically through "telemarketing" efforts. Therefore, the company has no reason to illegally access a customer or prospective customer's CPNI in order to sell it services.
- The company does not engage in any type of "winback" campaigns; therefore, the company has no reason to access a former customer's CPNI for purpose of trying to regain that customer's business.