

CPNI COMPLIANCE CERTIFICATE

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: 2/16/11

Name of company covered by this certification: Baja Broadband, LLC ("BAJA BROADBAND")

Form 499 Filer ID: 826819

Name of signatory: Peter Kahelin

Title of signatory: CEO

I, Peter Kahelin, certify that I am CEO of BAJA BROADBAND, and acting as an agent of BAJA BROADBAND, that I have personal knowledge that BAJA BROADBAND 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 as Attachment 1 is an accompanying statement explaining how BAJA BROADBAND's procedures ensure that BAJA BROADBAND is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

BAJA BROADBAND has not taken any actions against data brokers in the past year.

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

Signed:  _____ [Peter Kahelin]

**ATTACHMENT 1
TO CPNI COMPLIANCE CERTIFICATE**

Statement Regarding CPNI Operating Procedures

BAJA BROADBAND's written CPNI Operating Procedures ensure that BAJA BROADBAND will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of BAJA BROADBAND's CPNI Operating Procedures are:

- A requirement that BAJA BROADBAND have at all times a CPNI Compliance Supervisor to supervise the implementation of BAJA BROADBAND's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained if/when CPNI can be used for any purpose that would require customer approval.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

BAJA BROADBAND does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations.