Davis Wright Tremaine LLP

Suite 200
1919 Pennsylvania Avenue NW
Washington, DC 20006-3402

James M. Smith
202.973.4288 tel
202.973.4499 fax

jamesmsmith@dwt.com

February 24, 2011

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Creative Interconnect Communications, LLC, we are submitting herewith its **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for Calendar Year 2010** in the above-referenced proceeding.

Kindly address any questions concerning this submittal to the undersigned counsel.

Sincerely,

DAVIS WRIGHT TREMAINE LLP

James M. Smith
Counsel for Creative Interconnect Communications, LLC

cc: Best Copy and Printing, Inc. (via e-mail: FCC@BCPIWEB.COM)

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

Annual 47 CFR §64.2009(e) CPNI Certification for 2011 covering the prior calendar year (2010)

Date filed: Feb. 24, 2011

Name of company covered by this certification: Creative Interconnect Communications, LLC

Form 499 Filer ID: 824946

Name of signatory: William A. G. Wilde

Title of signatory: President

I, William A. G. Wilde, 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 requirements 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.,* proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) 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.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Attachment: Accompanying Statement Explaining CPNI Procedures

CREATIVE INTERCONNECT COMMUNICATIONS, LLC
STATEMENT OF CPNI OPERATING PROCEDURES

1. It is the policy of Creative Interconnect Communications, LLC (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
b. For the purpose of providing inside wiring installation, maintenance, and repair services.
c. For the purpose of marketing "adjunct-to-basic" services.
d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. At present, the Company does not engage in outbound marketing using CPNI. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.

3. Because the Company does not use, disclose or permit access to CPNI except as described above, by definition, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.

4. Because the Company does not use CPNI except as described above, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.

5. At this time, the Company does not offer online access to customer information. If in the future the Company allows customers to access their accounts and billing information online, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect CPNI.

6. Customers who contact the Company via inbound calls are not able to access their call detail information. If in the future the Company decides to convey call detail information to customers seeking such information via inbound calling, then the Company will take measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect call detail information.

7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2010.

9. The Company will notify the customer immediately if the customer's address of record is created (except at the time of service initiation) or changed. This notification is made by mail to the customer's pre-existing address of record, and does not reveal the changed information.

10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through http://www.fcc.gov/eb/cpni, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.