aptela™

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February 28, 2011

Via Electronic Comment Filing System

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

Re: Aptela, Inc.
CPNI Compliance Certification
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Aptela, Inc. and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's annual CPNI compliance certifications.

Best regards,

Ann Santorios

Enclosure

cc: Best Copy and Printing, Inc. (via email)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 28, 2011

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

Form 499 Filer ID: 826051

Name of signatory: Ann Santorios

Title of signatory: Vice President, Product and Business Development

I, Ann Santorios, 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. § 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 (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).
If affirmative:

Signed

ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE

Statement Regarding CPNI Operating Procedures

Aptela's written CPNI Operating Procedures ensure that Aptela 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 Aptela's CPNI Operating Procedures are:

- A requirement that Aptela have at all times a CPNI Compliance Supervisor to supervise the implementation of Aptela'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.
- Detailed procedures for obtaining opt-out and opt-in approval from customers.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns.
- A requirement that personnel be trained annually 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.