



March 1, 2011

**Via ECFS**

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

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for Calendar Year 2010**  
**Core180, Inc. - 499 Filer ID 825931**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2010 CPNI Compliance Certification and supporting Statement of CPNI Procedures and Compliance submitted on behalf of Core180, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with Public Notice DA 11-159 issued January 28, 2011.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

/s/ Robin Norton

Robin Norton  
Consultant to Core180, Inc.

*RN/sp*

Attachments

cc: Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
T. Patel – Core180 (via email)  
file: Core180 – FCC CPNI  
tms: FCC110x CPNI

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2010  
Name of Company covered by this certification: Core180, Inc.  
Form 499 Filer ID: 825931  
Name of Signatory: David Baule  
Title of Signatory: Chief Executive Officer

I, David Baule certify and state that:

1. I am CEO of Core180, Inc., 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.*
2. Attached to this certification, as Exhibit A, 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.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. 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.



David Baule, CEO  
Core180, Inc.

2/25/11

Date

Exhibit A

Statement of CPNI Procedures and Compliance

**Core180, Inc.**

Calendar Year 2010

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Core180, Inc.

Statement of CPNI Procedures and Compliance (2010)

Core180, Inc. ("Core180" or "Company") is a telecommunications network integrator and implements networks designed to address individual customer specifications. Core180 provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to contracts and via sales through a dedicated account representative. Core180's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Core180's policy not to disclose CPNI except as specifically set out in its contracts with customers and where required by law. The Company primarily markets services to enterprise customers, government agencies, and to organizations responding to bids issued by government agencies or "intermediate customers". Such marketing efforts never include the use of CPNI. In addition, the Company does not provide any usage-sensitive services to customers except for one account where it protects CPNI in compliance with the law and, with the exception of that one account, does not have access to call detail records.

Core180 does retain CPNI information that relates to the quantity, technical configuration, type, destination, location and amount of use a telecommunications service subscribed to by its customers. However, the Company does not obtain, retain or use call detail records for marketing purposes.

Core180 is committed to protecting the confidentiality of all customer information, including CPNI. The Company maintains all files containing CPNI in a secure manner such that they cannot be used, accessed, disclosed or destroyed by unauthorized employees or in an unauthorized manner. All customer information, including CPNI, is available through a password protected system with specific levels of access based on the individual employees job need. Employees with a need for customer specific information, including CPNI, are granted access to the password protected system by individual department manager only. The Company prohibits such violations through employment agreements (which include prohibitions against unauthorized use, access, disclosure of customer information) and through other means which

Core180, Inc.

Statement of CPNI Procedures and Compliance (2010)

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provide for disciplinary action for violations up to and including termination of employment. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes and for the provision, maintenance and repair of services.

The Company's website provides for a customer log-in portal. This portal is still under development. During 2010 customers were not able to log-in or obtain any records via this method.

With respect to the call detail the Company does retain, such information is not provided to customers over the phone or on-line.

The Company does not have any retail locations and therefore does not maintain or disclose call detail records in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, as required by applicable law.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, in calendar year 2010.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.