Visi Consulting Services

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VIA ECFS

March 4, 2011

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

Re: Annual Customer Proprietary Network Information Compliance Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Attached is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Telmex do Brasil, Ltda.

If there are any questions regarding this certification, please contact me via email to bobbi.vcs@comcast.net or via telephone at (205) 909-3783.

Sincerely,

Bobbi Ferguson

Bobbi Ferguson
Consultant to Telmex do Brasil, Ltda.

Attachments

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: March 4, 2011

Name of company(s) covered by this certification: Telmex do Brasil, Ltda.

Form 499 Filer ID: 825506

I 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 [attach accompanying statement].

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).

Signed _____ Date MARCH 3, 2011

Name JOSÉ FORMOSO MARTÍNEZ Title PRESIDENT

Diretoria Executiva Corporativa
EMBRATEL

ATTACHMENT A

Annual Customer Proprietary Network Information Compliance Certification
EB Docket No. 06-36

Telmex do Brasil, Ltda

CPNI OPERATING PROCEDURES

TELMEX DO BRASIL, LTDA.
CPNI OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH
47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001- 2011

Telmex do Brasil, LTDA. has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI') set forth in 47 C.F.R. §§ 64.2001- 64.2011 of the Commission's CPNI rules, as modified by the Commission in 2007.

CONFIDENTIALITY OF CARRIER INFORMATION

A telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for its own marketing efforts..

COMPANY SERVICES PROVISION

Telmex do Brasil, Ltda ("the Company") is an interexchange long distance and information service provider. and information services provider. The Company provides primarily international services such as dedicated point to point services to business customers. The Company does not provide presubscribed 1+ domestic long distance service.

CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

SAFEGUARDING AGAINST PRETEXTING

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC if it discovers any new methods of pretexting and of any actions it takes against pretexters and data brokers.

MARKETING PROCEDURES

The Company markets its services solely through direct sales. The Company does not use CPNI for marketing purposes and therefore does not have to maintain records regarding marketing campaigns that use its customers' CPNI.

UTILIZATION OF CPNI

(1) The Company obtains and utilizes CPNI solely for the purpose of providing interexchange and information services to its customers, billing its customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.

(2) The Company uses, discloses, or permits access to CPNI to provide or market service offerings among the interexchange and information category of service to which the Customer already subscribes.

(3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by the FCC's rules.

(4) Without Customer approval, the Company does not use, disclose or permit access to CPNI to provide or market service offerings within a category of service that the Customer does not already subscribe in accordance with the FCC's rules.

CPNI DISCLOSURE TO THIRD-PARTIES

The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request.

CUSTOMER AUTHENTICATION

All customer information is maintained in a password protected database that can be accessed only by authorized employees such as dedicated account representatives. Authorized employees may access CPNI to address customer questions only when the person calling is listed as an "authorized contact" for the business customer. Changes to and release of information for customer account records such as address, phone numbers or services must be requested by an authorized customer contact in accordance with the provisions of the customer's contract. All such requests are verified by the Company. Although the Company has not implemented passwords for the non-business customer, the Company will release call detail information based on customer-initiated telephone contact, if (1) a customer requests that the information be sent to the customer's address of record; or (2) the Company calls the telephone number of record and discloses the information, or (3) the customer can provide specific details of the call relevant to the customer service issue. If the customer cannot provide the relevant call detail information, the Company only provides the call detail information by calling the customer at the telephone number of record or mailing the information to the address of record. The Company does not currently provide online access to customers.

TRAINING AND DISCIPLINE

The Company prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law. The Company trains its employees in the authorized use of all customer information including CPNI. Any employee that discloses confidential customer information including CPNI is subject to disciplinary action and possibly termination.

NOTICE OF UNAUTHORIZED DISCLOSURE OF CPNI

As soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, The Company will provide electronic notification of the breach within seven business days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") via the following web site, www.fcc.gov/eb/CPNI/. In order to allow law enforcement time to conduct an investigation, The Company will wait another seven business days before notifying the affected customers of the breach (unless the USSS and FBI request The Company to postpone disclosure). The Company may notify customers sooner if there is a risk of immediate and irreparable harm. The Company will maintain records of discovered breaches for at least two years.

ADDITIONAL SAFEGUARDS

- The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- The Company designates one or more officers, as an agent or agents of the Company, to sign and file a CPNI compliance certificate on an annual basis.