

Audrey P. Rasmussen  
1120 20th Street, N.W.  
Suite 700, North Building  
Washington, DC 20036-3406  
Direct Dial: (202) 973-1210  
Facsimile: (202) 973-1212  
arasmussen@hallestill.com

February 7, 2012

FILED/ACCEPTED

FEB - 7 2012

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Suite TW-A325  
Washington, D.C. 20554

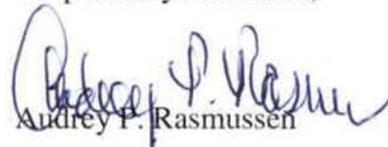
Re: EB-06-36  
Certification of CPNI Filing for Calendar Year 2011

Dear Ms. Dortch:

On behalf of Richard A. Sullivan, this certification and accompanying statement is sent pursuant to DA 11-159, released January 28, 2011 and Section 64.2009(e) of the Commission's rules in connection with the Customer Proprietary Network Information.

If there are any questions in connection with this filing, please contact this office.

Respectfully submitted,

  
Audrey P. Rasmussen

APR:gln  
Enclosure

cc: Best Copy and Printing, Inc., [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)  
Janice Myles, Competition Policy Division, Wireless  
Competition Bureau, FCC, [Janice.myles@fcc.gov](mailto:Janice.myles@fcc.gov)

81243.1:735689:00600

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for calendar year: **2011**

Date filed: **February 7, 2012**

Name of company(s) covered by the certification: **Richard A. Sullivan**

Form 499 Filer ID: **819178**

Name of signatory: **Richard A. Sullivan**

Title of signatory: **Owner**

Certification:

I, **Richard A. Sullivan**, 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 (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 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 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: 

## STATEMENT REGARDING OPERATING PROCEDURES

Richard A. Sullivan (“Carrier”) has established operating procedures that ensure compliance with the rules and regulations of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI), 47 C.F.R. Sections 64.2001-2009.

Carrier has a system in place in which the status of each customer’s CPNI approval can be established prior to any use, disclosure or access. A system is in place to properly authenticate customers prior to disclosing CPNI over the telephone which complies with the requirements of applicable Commission rules.

Carrier trains its employees in the authorized use of CPNI. Carrier has established disciplinary procedures for any employee which does not adhere to Carrier’s CPNI procedures. It also has procedures to notify law enforcement and customers(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

Carrier retains a record of the sales and marketing campaigns of it and its affiliates which use the CPNI of customers and Carrier maintains a record of Carrier’s compliance for at least the minimum of one year. Carrier’s records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. CPNI notifications are provided to customers as required by the Commission’s rules. Carrier maintains records of customer approval and notifications for the minimum period of one year. Opt-out elections are recorded and followed.

Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for marketing situations. Sales personnel are required to obtain supervisory approval for any proposed marketing request.

Carrier maintains confidentiality agreements pursuant to the Commission's CPNI rules with any joint venture partner and independent contractor.