



February 24, 2012

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

Re: Annual 47 C.F.R. 64.2009(e) CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

In the pages following this cover letter you will find the Annual 47 C.F.R. 64.2009(e) CPNI Certification of Xanadoo, LLC for calendar year 2011. The within is submitted in connection with EB Docket NO. 06-36.

Should you have any questions regarding this filing please feel free to contact me at (610) 934-7058.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Eyer", is written over a horizontal line.

Mark E. Eyer
Assistant General Counsel

Encls.

Encls.

Cc: Best Copy and Printing, Inc. (via FCC@BCPIWEB.com)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

Date filed: February 24, 2012

Name of company covered by this certification: Xanadoo, LLC

Form 499 Filer ID: 827952

Name of signatory: Howard E. Verlin

Title of signatory: Executive Vice President

I, Howard E. Verlin, 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 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 statement and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Xanadoo, LLC



By: **Howard E. Verlin**
Title: **Executive Vice President**
Dated: **February 24, 2012**

Description of CPNI Policies and Procedures

Xanadoo, LLC maintains the security of CPNI. The company has security measures in place to protect this data from external attacks to its website and improper verbal requests for data via personal contacts with Xanadoo's customer care. Xanadoo's web portal allows customers to view traffic data but has login/password security to ensure the security of this information. The web portal limits customers to accessing their specific data only. The company also has procedures in place that allow only customers of record to obtain specific call detail information, including a requirement that customer service representatives confirm the customer's identity. The company's employees have been trained in the proper use of CPNI and the company will enforce strict disciplinary measures for employees that misuse or mishandle CPNI. Xanadoo does not provide CPNI to any third parties and does not sell CPNI.