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February 28, 2012

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

Re: **EB Docket No. 06-36**
Annual 47 C.F.R. 64.2009(e) CPNI Certification for 2011

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, submitted herewith on behalf of LightSquared Subsidiary LLC, is the carrier's 2011 CPNI certification with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Sincerely yours,

Glenn S. Richards

Enclosure



Annual 47 C.F.R. 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 28, 2012

Name of company covered by this certification: LightSquared Subsidiary LLC

Form 499 Filer ID: 821578

Name of signatory: Jeffrey Carlisle

Title of signatory: Executive Vice President, Regulatory Affairs & Public Policy

I, Jeffrey Carlisle, 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.

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.

Signed _____

A handwritten signature in blue ink, appearing to be "Jeffrey Carlisle", written over a horizontal line.

Description of CPNI Policies and Procedures

Technical and Operational Initiatives

LightSquared Subsidiary LLC ("LightSquared") designed a programming update for its billing system that incorporates safeguards that will protect CPNI. These safeguards are accompanied by operating procedures for frontline staff that have system access to the information. The system allows LightSquared to assign passwords to ensure that CPNI is not provided to a caller or a web visitor without authentication of their identity.

Web Site Updates

LightSquared web activation and web query applications leverage the CPNI security of LightSquared's billing system and authentication infrastructures. The system is a secure site which requires User ID and Password and handles password protected self-service web access and web-services access for customers who wish to:

1. View and print invoices and call detail
2. Change password or account information
3. Have lost a password or need help
4. Have a complaint or suggestion about CPNI

Automated System Notification to the Address of Record

The billing system has been programmed to automatically generate notification of password or address of record changes, which are sent to the customer address of record.

Website Process

Password access and authentication of callers are required before CPNI is shared for the following:

1. View/Print Invoice or Call Detail
2. New Password or Lost Password
3. Change Password
4. Change Address
5. Credit Card Payment and Pre-Authorized Credit Card Payment

Sales Process

The process for sales to new customers ensures that customers are authenticated with photo identification by a dealer during the face to face purchase of the service. The sales contract and terms and conditions include: a dealer signature line testifying to the collection of photo identification, and identification detail line, a notification to the customer regarding password protection, and a page describing CPNI authentication requirements.

Dealer Notification

All dealers are notified by mail of LightSquared's CPNI obligations. Dealers are also invited to CPNI dealer training sessions.

Customer Notification

All customers are provided notice of LightSquared's CPNI obligations and initiatives. The notification includes the FCC definition of CPNI, LightSquared's policy to protect CPNI and a description of LightSquared's CPNI initiatives. The notification also alerts customers to the availability of the password protected website to allow them access to their own CPNI. System encrypted passwords are issued to customers and mailed via regular first class mail. Every two years LightSquared notifies its customers belonging to shared Talk Groups of their ability to notify LightSquared that they may opt out and not have LightSquared share their CPNI information with the owner/host of shared Talk Groups (TG) that they are members of.

Training Initiatives: Employee Training on New Policies and Procedures

LightSquared trains all new employees on LightSquared CPNI policies.

Tracking and Investigating Breach of LightSquared CPNI Obligations

A detailed policy and procedure for investigating breaches of LightSquared's CPNI obligations has been developed and communicated to employees. The policy includes express disciplinary procedures and reporting mechanisms if a breach in CPNI obligation is identified.

Use of CPNI

LightSquared does not use CPNI for marketing or other purposes.