

FREEDOM TECHNOLOGIES, INC.
1100 Wilson Blvd, Suite 1200
Arlington, VA 22209

March 1, 2012

Via ECFS

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

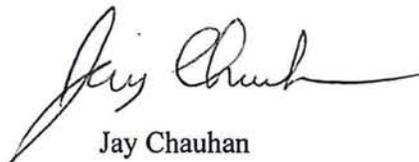
**RE: EB Docket No: 06-36, 2009 CPNI Certification
for 499 Form Filer ID: 820876**

Dear Ms. Dortch:

Telecom New Zealand (USA) Ltd. ("TNZ USA"), through its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI compliance certificate and accompanying statement explaining the procedures in place.

If you have any questions or concerns about the certification, please contact the undersigned.

Sincerely,



Jay Chauhan

cc: Best Copy Printing, Inc. via e-mail FCC@BCPIWEB.COM

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification - 2011
EB Docket 06-36

Date filed: March 1, 2012

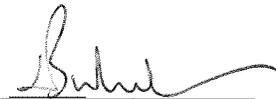
Form 499 Filer ID: 820876

I, Laurie Miller, certify that I am an officer of Telecom New Zealand (USA) Ltd. (TNZ USA), and acting as an agent of the company, that I have personal knowledge that TNZ USA has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

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. *See Exhibit A.*

The company has not taken any actions 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.

Signed 

Date: March 1, 2012

Name: Laurie Miller

Title: President and Country Manager

Contact Person: Laurie Miller

Telephone: (626) 432-4300

Exhibit A: 47 C.F.R. 64.2009 Compliance Certificate Accompanying Statement

Telecom New Zealand (USA) Ltd. (TNZ USA) has implemented a system from which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

TNZ USA has trained its personnel as to when they are, and are not, authorized to use CPNI with an express disciplinary process in place.

TNZ USA maintains a record of its own and its affiliates' sales and marketing campaigns that use its customers' CPNI. TNZ USA further maintains a record of all instances that CPNI was disclosed or provided to third parties, or that third parties were allowed access to CPNI. Such records conform to the requirements of 47 C.F.R. 64.2009 and are maintained for the minimum period of one year. It should be noted however, that TNZ USA is a reseller that only sells its services to other carriers. As such, TNZ USA has no end user customers.

As stated above, TNZ USA is a reseller only and does not undertake any outbound marketing.

TNZ USA has a procedure in place to notify the Commission within five business days of any instance that the opt-out mechanisms do not work properly as required by 47 C.F.R. 64.2009.