

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.

1. Date filed: February 29, 2012
2. Name of company(s) covered by this certification: insideMyCity, LLC d/b/a insideMyCity Telecom
3. Form 499 Filer ID: 828511
4. Name of signatory: John S. White, Sr.
5. Title of signatory: Chief Operating Officer
6. Certification:

I, John S. White, Sr., 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) 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:  _____

Attachment: Accompanying Statement Explaining CPNI Procedures

insideMyCity, LLC d/b/a insideMyCity Telecom

Statement of CPNI Operating Procedures

insideMyCity, LLC d/b/a insideMyCity Telecom (“insideMyCity”) provides Voice over Internet Protocol (“VoIP”) services, broadband services, and other related cable and telecommunications services to the public. insideMyCity has established policies and procedures to comply with the Federal Communications Commission's (“FCC’s”) rules regarding the use, disclosure, and access to §64.2001 *et seq.* of the Commission's rules, 47 C.F.R. §64.2001 *et seq.* These procedures ensure that insideMyCity is in compliance with the FCC's customer proprietary network information (“CPNI”) rules. This statement is a summary of insideMyCity's policies and procedures designed to safeguard CPNI.

Its customers will be provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customer’s authorized persons to receive the customer's CPNI. insideMyCity will maintain and utilize CPNI for the limited purposes of initiating, rendering, billing and collecting of its services, and may use CPNI, if necessary, to protect its property rights. insideMyCity does plan not use any CPNI for any marketing purposes, nor will insideMyCity disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

insideMyCity will implement appropriate safeguards for the disclosure of CPNI, including instituting procedures to (1) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact, online account access, or an in-store visit (e.g. use of verbal or online passwords without the use of readily available biographical or account information, or requiring a valid photo ID matching the customer's account information); and (2) providing notification to customers of account changes.

insideMyCity will implement measures to discover and to protect against unauthorized attempts to access CPNI. insideMyCity has also implemented measures to discover and to protect against unauthorized attempts to access CPNI. insideMyCity will train its personnel as to what information is classified as CPNI and when they are authorized and not authorized to use this information. insideMyCity will have an express disciplinary process for the misuse and/or mishandling of customer information including CPNI, which includes the potential for termination.

insideMyCity also will implement procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. insideMyCity will notify its customers of the security breach, if permitted, and will notify of the breaches and notifications for a two-year period. insideMyCity will track customer complaints regarding CPNI.

insideMyCity will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.