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China  
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CHINA UNICOM (AMERICAS) OPERATIONS LTD.

HERNDON, VA (HQ) | LOS ANGELES, CA | NEW YORK, NY | SAN JOSE, CA | TORONTO, CANADA

Date: Feb 29, 2012

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

**Re: China Unicom (Americas) Operations Ltd. Annual Customer Proprietary Network Information Certification for 2011; EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing in the above-referenced docket, please find the 2011 Annual 47 C.F.R. §64.2009(e) Customer Proprietary Network Information Certification for China Unicom (Americas) Operations Ltd. ("China Unicom") and an accompanying statement regarding China Unicom's operating procedures.

Please do not hesitate to contact me should you have any questions.

Sincerely yours,

Yitao Wu  
President

cc: Best Copy Printing, Inc. (Portals II, CY-B402, 445 12th Street, S.W., Washington D.C. 20554)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2010

1. Date filed: Mar 12, 2012
2. Name of company(s) covered by this certification: China Unicom (Americas) Operations Ltd
3. Form 499 Filer ID: 824402
4. Name of signatory: Yitao Wu
5. Title of signatory: President
6. Certification:

I, Yitao Wu, 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

Attachments: STATEMENT OF CPNI COMPLIANCE: CHINA UNICOM(AMERICAS)

**STATEMENT OF CPNI COMPLIANCE:  
CHINA UNICOM (AMERICAS) OPERATIONS LTD.**

**February 23, 2012**

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China Unicom (Americas) Operations Ltd. (“China Unicom” or the “Company”) has established internal operating procedures pursuant to Section 222 of the Communications Act of 1934, as amended (47 U.S.C. § 222) and Section 64.2001 *et seq.* of the rules of the Federal Communications Commission to safeguard the use and dissemination of customer proprietary network information (“CPNI”).

China Unicom provides telecommunications services in, to or from the United States to established customers, but otherwise currently does not engage in marketing activities, and thus does not use CPNI for marketing purposes. It also does not provide CPNI to any affiliated or non-affiliated third parties, except as necessary to provide the services and as permitted in Section 222(d) of the Communications Act.

China Unicom safeguards CPNI by:

- Training employees regarding the Company’s policy that prohibits the use of CPNI to market the Company’s services;
- Instructing employees not to conduct any marketing without internal oversight and approval to ensure the CPNI requirements are followed (and to establish appropriate consumer consent mechanisms if they are required);
- Taking disciplinary action against employees for any violations of the Company’s CPNI policies;
- Establishing a process to maintain any applicable CPNI-related records (including any sales and marketing campaigns that the Company may undertake in the future);
- Designating a corporate officer who is responsible for overseeing the Company’s compliance with the CPNI requirements; and
- Establishing procedures for notifying the FCC, law enforcement and customers in the event of any breaches of CPNI.

In accordance with Section 64.2009(e) of the FCC’s rules, to China Unicom’s knowledge no CPNI was obtained by any data broker or unauthorized third party in 2011. China Unicom took no actions (proceedings instituted or petitions filed at state commissions, the court system, or at the Commission) against data brokers in 2010, and it received no customer complaints in 2011 regarding the unauthorized release of CPNI.