

THE
COMPLIANCE
GROUP

February 12, 2013

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

Re: **INNOVATION LABS, LIMITED LIABILITY COMPANY**
CPNI Certification Pursuant to 47 C.F.R. Â§ 64.2009(e)
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of INNOVATION LABS, LIMITED LIABILITY COMPANY ("ILABS"), enclosed herewith please find the company's Annual Customer Proprietary Network Information Certification ("CPNI Officer Certification") covering 2012.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Christopher A. Canter
On behalf of INNOVATION LABS, LIMITED LIABILITY COMPANY

INNOVATION LABS, LIMITED LIABILITY COMPANY

Statement of CPNI Procedures and Compliance

INNOVATION LABS, LIMITED LIABILITY COMPANY ("ILABS") provides exclusively carrier-to-carrier telecommunications services. It has no end-user customers. Consequently, ILABS does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. ILABS does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to other carriers. ILABS typically does not obtain the end-user customer's billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end-user customer's service.

ILABS may obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because ILABS provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by ILABS is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

ILABS safeguards from improper use or disclosure by employees the call detail information that ILABS obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, ILABS has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to ILABS computers and call detail records. In the event of unauthorized CPNI access, ILABS will notify the requisite law enforcement agencies, and the customer when possible.

ILABS did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because ILABS does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through ILABS, it cannot notify those end-user customers directly if a breach occurs. However, ILABS has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than information that has been publicly reported, regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

INNOVATION LABS, LIMITED LIABILITY COMPANY

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

COMPANY NAME: INNOVATION LABS, LIMITED LIABILITY COMPANY

REPORTING PERIOD: January 1, 2012 - December 31, 2012

FILER ID: 827910

OFFICER: David Saldana-Villasana

TITLE: Owner

I, David Saldana-Villasana, hereby certify that I am an officer of INNOVATION LABS, LIMITED LIABILITY COMPANY ("ILABS") and that I am authorized to make this certification on behalf of ILABS. I have personal knowledge that ILABS has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to ILABS or to any of the information obtained by ILABS. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures ILABS employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to ILABS or to the information obtained by ILABS.

Signed: _____



On behalf of INNOVATION LABS, LIMITED LIABILITY COMPANY

Date: _____

FEB 8, 2013