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06-36
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January 29, 2013

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

RE: CPNI Certification

Dear Ms. Dortch:

Please find enclosed our annual certification covering calendar year 2012.

Sincerely,



Eric Behling, CFO

EKB/m

Enclosures

CC: FCC@BCPIWEB.com

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Simply Bits, LLC

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2012.

Date filed: January 29, 2013

Name of company(s) covered by this certification: Simply Bits, LLC

Form 499 Filer ID: 828720

Name of signatory: Bradley Feder

Title of signatory: Managing Member

Certification:

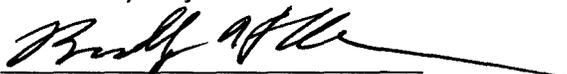
I, Bradley Feder, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

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. S: 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:

Accompanying Statement explaining CPNI procedures

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Accompanying Statement to Annual Certification of CPNI for Calendar Year 2012

January 29, 2013

- a) The Company has not sought customer approval of the use of CPNI since CPNI is not used by the Company in any sales or marketing campaign.
- b) The Company's obligations regarding the protection of customers' CPNI data is defined in §15 the Company's Terms & Conditions. These terms & conditions are provided and/or made available to the Company's customers before any services are ordered or provisioned. These terms & conditions are available on the Company's website at the following URL:
<http://www.simplybits.com/terms.aspx>.
- c) The Company's Chief Financial Officer has been assigned responsibility for administering the Company's CPNI program and is the Company's privacy officer.
- d) The Company has trained all personnel with access to CPNI as to (i) the identification of CPNI; (ii) authenticating customers; (iii) when CPNI may be used; and (iv) reporting procedures in the event of a customer complaint. Company personnel do not receive network credentials to any database containing CPNI data unless and until they have reviewed a Company CPNI orientation and spoken personally with the Company's designated *privacy officer*.
- e) All employees of the Company, regardless of their need to know, receive periodic reminders about the Company's obligations vis-à-vis the FCC's CPNI regulations. These generally occur as part of normally scheduled all-employee meetings. In addition, the Company's employee handbook addresses Company confidential information, including CPNI, and describes the expectations placed on employees as well as the disciplinary consequences for any employee breach of trust, which includes possible termination of employment for breach.
- f) The Company did not receive any complaints regarding CPNI during calendar year 2012.