



**CINNAMON
MUELLER**

www.CinnamonMueller.com

ST. LOUIS
1714 Deer Tracks Trail
Suite 215
St. Louis, MO 63131

phone: 312-372-3930
fax: 312-372-3939

CHICAGO
307 N. Michigan Ave
Suite 1020
Chicago, IL 60601

phone: 312-372-3930
fax: 312-372-3939

WASHINGTON, DC
1333 New Hampshire Ave, NW
Floor 2
Washington, D.C. 20036

phone: 312-372-3930
fax: 312-372-3939

Bruce E. Beard

Admitted in Illinois and Missouri
Telephone: 314-394-1535

February 22, 2013

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

Via ECFS

**Re: Workspace Communications, LLC
CPNI Officer's Compliance Certificate
Docket 06-36**

Dear Ms. Dortch:

Attached please find the above-referenced CPNI Officer's Certificate which is being filed electronically in Docket 06-36. Should you have any questions, please contact us at (314) 394-1535.

Sincerely,

Bruce E. Beard

Enclosures

OFFICER'S CPNI COMPLIANCE CERTIFICATE

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

Date filed: February 22, 2013:

Name of company(s) covered by this certification: WorkSpace Communications, LLC ("Work Space")

Form 499 Filer ID: 828501

Name of signatory: Bryan DiGiorgio

Title of signatory: Chief Executive Officer

I, Bryan DiGiorgio, 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 any actions (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 any customer complaints in the past year concerning the unauthorized release of CPNI (e.g. instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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 be subject it to enforcement action.

Signed  _____
Bryan DiGiorgio

**ATTACHMENT 1
TO CPNI COMPLIANCE CERTIFICATE**

Statement Regarding CPNI Operating Procedures

Work Space Communications, LLC dba WorkSpace Communications' ("Work Space") written CPNI Operating Procedures ensure that Work Space will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Work Space's CPNI Operating Procedures are:

- A requirement that Work Space have at all times a CPNI Compliance Supervisor to supervise the implementation of Work Space CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

Work Space does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations.