OBM Service & Delivery
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February 25, 2013

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

Re: Certification of CPNI Filings
EB Docket No. 06-36

Dear Ms. Dortch:

OBM Service & Delivery is filing herewith, in accord with the Commission's Public Notice (DA 13-61 Released January 16, 2013) and 47 C.F.R. Section 64.2009(e), files its Certification of Compliance and an accompanying statement for year ended December 31, 2012.

Thank you for your attention to this matter.

Very truly yours,

James J. Crawford

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 25, 2013

Name of company(s) covered by this certification: OBM Service & Delivery

Form 499 Filer ID: N/A

Name of signatory: James J. Crawford

Title of signatory: Vice President

I, James J. Crawford, certify that I am an officer of OBM Service & Delivery and acting as an agent of OBM Service & Delivery 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.

The company represents and warrants that the above certification is consistent with 47.CF.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: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers
Summary of customer complaints

Accompanying Statement to
Annual CPNI Compliance Certification
CPNI Procedures

In compliance with 47 C.F.R. § 64.2001 et seq, I, James J. Crawford, officer of OBM Service & Delivery certifies that the company has taken the following steps in compliance with the rules of the Federal Communications Commission which govern the protection of Customer Proprietary Network Information (CPNI).

The following operating procedures ensure that OBM Service & Delivery is in compliance with the FCC's CPNI Rules:

OBM Service & Delivery does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

OBM Service & Delivery only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. OBM Service & Delivery does not use its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F. R. § 64.2001 et seq.

OBM Service & Delivery has practices and procedures that govern the disclosure of CPNI:

- OBM Service & Delivery does not disclose or release CPNI upon a customer's telephone request.
- OBM Service & Delivery does not disclose or release CPNI through online access over the Internet.
- With respect to telephone inquires by customers concerning specific call-related issues, OBM Service & Delivery requires the customer to provide sufficient specific information about the call in question to confirm the customer's identity.
- OBM Service & Delivery automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
- OBM Service & Delivery is prepared to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.

OBM Service & Delivery provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse.

It is a violation of OBM Service & Delivery policies to disclose CPNI outside of OBM Service and Delivery. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.

Access to CPNI at OBM Service & Delivery s restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

Strict controls are in place involving responses to law enforcement agencies that serve OBM Service & Delivery with valid legal demands, such as a court ordered subpoena, for CPNI. OBM Service & Delivery will not supply CPNI to any law enforcement agency that does not produce valid legal demand.

Summary of Actions
Taken Against Data Brokers

In compliance with 47 C.F.R. § 64.2009(e), I, James J. Crawford, acting on behalf of OBM Service & Delivery summarize the actions that the Company has taken against Data Brokers within the last year:

No such actions taken against Data Brokers within the last year

Summary of
Customer Complaints Received

In compliance with 47 C.F.R. §64.2009 (e), I James J. Crawford, acting on behalf of OBM Service & Delivery provide a summary of customer complaints received within the last year:

1. The Company has received no complaints as a result of improper access by employees.
2. The Company has received no complaints as a result of improper disclosure to individuals not authorized to receive the information.
3. The Company has received no complaints as a result of instances of improper access to online information by individuals not authorized to view information.