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March 1, 2013

VIA ECFS
(http://www.fcc.gov/cgb/ecfs)

The Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington DC 20554

Re: **Annual 64.2009(e) CPNI Certification for Calendar Year 2012**
EB Docket 06-36

BT Americas Inc.
FCC Form Filer ID 809483

Radianz Americas Inc.
FCC Form Filer ID 823182

BT Conferencing Video Inc.
FCC Form Filer ID 827277

BT Conferencing Inc.
FCC Form Filer ID 821924

BT LatAm Corp.
FCC Form Filer ID 825498

BT LatAm Inc.
FCC Form Filer ID 821680

I, A. Sheba Chacko, certify that I am an officer of the companies named above (hereinafter referred to as "BTA"). As stated in the CPNI compliance statement attached, the BTA companies do not operate as a telecommunications carrier or common carrier in the U.S. and hence the Title II CPNI certification requirements do not apply to these companies.

Nevertheless, out of an abundance of caution, the BTA companies file this CPNI certification. However, in doing so, the BTA companies do not concede the applicability of Section 64.2009(e) to their US operations.

Acting as an agent of BTA, I have personal knowledge that they have established operating procedures that are adequate to ensure compliance with the Commission's

CPNI rules. Attached is an accompanying statement explaining how the procedures of the BTA companies meet the requirements set forth in 47 C.F.R. Section 64.2001 et seq of the Commission's Rules. BTA has not taken any actions against data brokers in the past year nor has BTA received any customer complaints in the past year concerning the unauthorized release of CPNI.

BTA represents and warrants that this certification is consistent with 47 C.F.R., Section 1.17, which requires truthful and accurate statements to the Commission. BTA also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Respectfully submitted,

BT AMERICAS INC,
BT CONFERENCING VIDEO INC.
BT CONFERENCING INC.
BT LATAM CORP.
BT LATAM INC.
RADIANZ AMERICAS INC.

By: _____

A SHEBA CHACKO

CC: Best Copy and Printing Inc.
445 12st Street, Suite CY-B402
Washington, DC 20554

Attach: Statement of Compliance

Statement on CPNI Compliance

BT Americas Inc., Radianz Americas Inc., BT Conferencing Inc., BT Conferencing Video Inc., BT LatAm Inc. and BT LatAm Corp. (hereinafter collectively referred to as "BTA") provides exclusively to its customers global information communications technology services that include information, systems integration services, consulting and "telecommunications", but not "telecommunications services", as those terms are defined in sections 3(20), 3(43) and 3(46), respectively, of the Communications Act or common carrier services. Therefore, BTA is not a "telecommunications carrier", as that term is defined in section 3(44) of the Act. The certification requirement in section 64.2009(e) of the Commission's Rules applies by its terms exclusively to a "telecommunications carrier." Because BTA is not a "telecommunications carrier", section 64.2009(e) does not apply to its operations.

For the additional information of the Commission, BTA, which serves only large global enterprises, does not use any information that would be considered to be CPNI if BTA provided "telecommunications services" except in the provision or marketing of services among the category of service to which a customer already subscribes.

- BTA serves large multinational customers who negotiate stringent contract terms regarding the protection and use of their customer data and which customers are serviced by dedicated account representatives .

- BTA may, pursuant to the express affirmative consent of the customer as set forth in a customer contract, provide services jointly with affiliates or a third party

- BTA personnel are trained to protect the confidential information of its customers.

- Employees, agents and subcontractors of BTA are required to undergo training regarding the use and access of customer data as embodied in the EU data protection directives and the FCC's CPNI rules that would be applicable to BTA if it operated as a telecommunications services provider in the U.S.

- Employees, agents, subcontractors and joint venture partners are required to execute confidentiality and nondisclosure commitments

- BTA does not provide telephone exchange services and therefore is not subject to the CPNI requirements that relate to telephone exchange services.

- BTA did not use data brokers in 2012 nor has it received any customer complaints in 2012 regarding unauthorized release of CPNI.

- No breaches occurred in 2012 that required BTA to notify law enforcement under the applicable CPNI rules. Should a breach occur, BTA has established policies and procedures that comply with the FCC's CPNI rules and BTA's CFIUS commitments.