Dune Telecom LLC
246 Durand St.
Pickerington, OH 43147-7941

March 1, 2013

VIA ECFS

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

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification in EB Docket 06-36

Dear Ms. Dortch:

Dune Telecom LLC hereby submits its Annual CPNI Certification and accompanying statement of compliance, in EB Docket No. 06-36.

If you have any questions about this filing, please contact us.

Sincerely,

Imke Louis-Mensah [electronic signature]
President

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification for Fiscal Year 2012

EB Docket 06-36

Date filed: March 1, 2013

Name of company covered by this certification: Dune Telecom LLC

Form 499 Filer ID: 829273

Name of signatory: Imke Louis-Mensah

Title of signatory: President

I, Imke Louis-Mensah, 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 set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions against data brokers in the past year. I acknowledge that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI, and I do not have any evidence nor information that pretexters have attempted to access CPNI in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI and I acknowledge that if the company does receive any such complaints, it must provide that information to the Commission.

Signed: Imke Louis-Mensah [electronic signature]
Title of signatory: President

Annual 47 C.F.R. S: 64.2009(e) CPNI Certification for Fiscal Year 2012

EB Docket 06-36

Dune Telecom LLC

Filed: March 1, 2013

Statement of CPNI Procedures and Compliance for Fiscal Year 2012

Dune Telecom LLC (Company) is a provider of wholesale long distance services to other registered carriers.

To the fullest extent possible, Company ensures that its business methods and operating procedures are in compliance with FCC rules pertaining to CPNI.

As a provider of wholesale long distance services to other registered carriers, Company generally does not have access to customer information such as name, address, and other personal information. Company's access to CPNI is limited to Call Detail Records and other data collected by its switches, which is minimal since there is no personal customer information to relate to.

Company does conduct a limited number of transactions over the Internet through which personal and/or corporate information is obtained from prospective carrier customers. Such information is used exclusively to coordinate telecom traffic, telecom circuits and process payments.

In any case, Company does not use CPNI for marketing purposes and ensures that the limited CPNI it does have access to are not sold or given to any third parties for any purpose, unless pursuant to lawful subpoena.

Should Company elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Company Customer Service personnel do not release CPNI or call detail information to incoming callers. Company will only release CPNI or call detail information to carrier clients or carrier providers as required by contract. If requested, Company will only release CPNI or call detail information to third parties after receiving written consent from the authorized Customer Contact.

Company does not disclose CPNI on-line. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of

authentication procedures that do not require the use of readily available biographical or account information and customer notification of account changes.

Company does not offer services directly to the public and therefore does not have customer information such as name, address, and other personal information. Company does not have retail locations and therefore does not allow in-store access to CPNI.

Company has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. Such procedures require notification and management of the process by the Company President.

The Company has not taken any actions against data brokers in the past year.

The Company did not receive any complaints about unauthorized release or Disclosure of CPNI in the past year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.