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*Firm Advisory*

February 2, 2007

**ANNUAL CPNI COMPLIANCE CERTIFICATE  
FILING REMINDER**

FCC regulations require all telecommunications carriers to submit a customer proprietary network information (“CPNI”) compliance certificate on an annual basis. Last year, the FCC directed all carriers to comply with this rule by February 6<sup>th</sup>. As this compliance filing is an annual requirement, all carriers should once again file a CPNI compliance certificate on or near February 6, 2007.

For most carriers, this year’s filing will be similar to last year’s submission, although a description of newly implemented procedures over carrier use of CPNI, if any, should also be included. As a reminder, the CPNI compliance certificate must (1) be signed by an officer of the company, and (2) state that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC rules over carrier use of CPNI. The filing carrier must also provide a statement explaining how its operating procedures ensure compliance with the FCC’s rules regarding carrier use of CPNI.<sup>1</sup>

For further information regarding this issue or for assistance in preparing and filing the certificate, please contact either of the following attorneys:

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<sup>1</sup> These rules are found in 47 C.F.R. § 64.2009 *available at* [http://a257.g.akamaitech.net/7/257/2422/13nov20061500/edocket.access.gpo.gov/cfr\\_2006/octqtr/47cfr64.2009.htm](http://a257.g.akamaitech.net/7/257/2422/13nov20061500/edocket.access.gpo.gov/cfr_2006/octqtr/47cfr64.2009.htm).

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