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#09-07
Revised

February 11, 2009

TO: PTA Member Companies
FROM: Steve Samara 
RE: Annual CPNI Certification **Due No Later Than March 1st**

The annual CPNI Certification is due **no later than March 1, 2009**. ALL telecommunications carriers must file this certification.

In April of 2007, the FCC released an Order strengthening its privacy rules, adopting additional safeguards to protect CPNI against unauthorized access and disclosure. One of those changes was establishing the requirement that all companies subject to the CPNI rules file annually, a certification with the FCC pursuant to amended rule 47 C.F.R. § 64.2009(e) – attached.

Also attached is a Public Notice dated January 7, 2009, from the FCC on that subject. The Public Notice also has a template for the certification that members may use. Certifications may be filed electronically or by paper copy. For interpretation of the FCC's public notice regarding CPNI requirements, please contact your federal attorney or the national communications association where you may be a member. PTA is hesitant to interpret this federal requirement in that companies have historically been fined for failure to comply by the FCC, for what appear to be "minor infractions".

cc: PTA Service Committee