

Compliance Reminder: Annual CPNI Certification Due March 1

February 22, 2010

What: Annual CPNI Certification pursuant to Section 64.2009. Carriers must certify that their procedures comply with the FCC's privacy rules, disclose complaints about CPNI breaches and identify actions taken against pretexters. The certification must be signed by an officer of the company and based on the officer's personal knowledge. In addition, the certification must be accompanied by a statement describing the company's CPNI policies and explaining how those policies comply with the rules.

Where: Certifications are to be filed in FCC docket no. 06-36.

When: Due by March 1, 2010

Who must file: All telecommunications carriers and all interconnected VoIP providers. Filing obligation applies to carriers who are *de minimis* for USF purposes. Filing obligation does not apply to private carriers.

WARNING: Last year, the FCC proposed base fines of \$20,000 to companies that failed to file certifications or that filed certifications that did not comply with the rules.