



A Professional Limited Liability Company  
307 North Michigan Avenue, Suite 1020  
Chicago, Illinois 60601  
Telephone: 312-372-3930  
Facsimile: 312-372-3939

**SPECIAL UPDATE REMINDER**  
**February 27, 2009**

---

**VoIP CPNI Officer Certificate Due March 2**  
**Strict Enforcement by FCC**

The FCC's CPNI rules require that an officer of an interconnected VoIP provider file a certificate with the FCC annually stating that the officer has personal knowledge that the provider has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. **The annual certificate for 2008 must be filed on or before March 2, 2009.**

The FCC just issued Notices of Apparent Liability against **600** companies, with a proposed \$20,000 fine each for the alleged failure to timely file last year's CPNI certification. The FCC also announced several smaller fines against various companies who filed, but did not provide complete information. This included a company that was fined for filing the CPNI certification one day late.

Interconnected VoIP providers must include a statement explaining how its operating procedures ensure that it is in compliance with the FCC's CPNI rules. The provider must also include, if applicable, an explanation of any actions taken against data brokers, as well as a summary of all customer complaints concerning the unauthorized release of CPNI received in the past year. The CPNI certificate must be filed in EB Docket No. 06-36.

If you have any questions regarding the filing, please do not hesitate to contact Bruce Beard at [bbeard@cm-chi.com](mailto:bbeard@cm-chi.com) or 636-532-7478, or Jeremy Kissel at [jkissel@cm-chi.com](mailto:jkissel@cm-chi.com) or 202-609-7793.

---

*Please visit our website at [www.cinnamonmueller.com](http://www.cinnamonmueller.com) to learn more about our lawyers and practice. You can reach Cinnamon Mueller at 312-372-3930. This update is provided by the law firm of Cinnamon Mueller. The document is intended for informational purposes only as a service to clients of Cinnamon Mueller and to the members of the American Cable Association. It is not intended to provide specific legal advice or to substitute obtaining appropriate legal counsel. We encourage you to consult with counsel to address special compliance issues and for assistance in negotiating or handling any such matter referred to in the update.*