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CLIENT UPDATE
May 14, 2008

**Small VoIP Providers Must Implement Online
CPNI Authentication Procedures by June 8, 2008**

On December 8, 2007, the FCC's new CPNI procedures went into effect for VoIP providers. However, the FCC gave a 6-month grace period to VoIP providers with 1,500 or fewer employees (including employees of affiliates) to implement the FCC's online authentication procedures. The grace period ends on June 8, 2008. By that date, small VoIP providers must:

- Authenticate customers without the use of readily available biographical information or account information prior to allowing them online access to CPNI related to their VoIP account.
- Allow customers to obtain online access to CPNI related to their VoIP account only through a password that is not prompted by asking for readily available biographical information or account information.

Remember - when establishing a password for a customer, your company must authenticate the customer without the use of readily available biographical information or account information. Your company may create a backup customer authentication method in case a customer loses or forgets his or her password, but the backup authentication method may not prompt the customer for readily available biographical information or account information.

If your company has any questions about online authentication or other CPNI issues, please call Nicole Paolini-Subramanya at 312-372-3930 for more information.

2008 Leased Access Report Deadline Extended to July 15, 2008

The Commission recently released an Order extending the filing date for the 2008 Annual Leased Access Report "to permit review of the information collection by the Office of Management and Budget." Pending approval by the Office of Management and Budget, the 2008 form will be due July 15, 2008. Cable operators must submit information pertaining to leased access rates, usage, channel placement, and complaints, among other leased access matters.

If you have questions about your company's leased access obligations, please call Nicole Paolini-Subramanya or Emily Denney at (312) 372-3930.

Please visit our website at 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.*