REDACTED -
FOR PUBLIC INSPECTION

10301 Strathmore Hall St Ste 421
North Bethesda, MD 20852
sbahr@bahrlaw.com
(301) 926-4930

February 19, 2015

(Via ECFS)
Marlene Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th St, SW - Room TW-A325
Washington, DC 20554

RE: Docket No. 06-36
Franklin Telephone Co., Inc. and FranklinVT, LLC
Form 499 Filer ID: 809840 / 824340

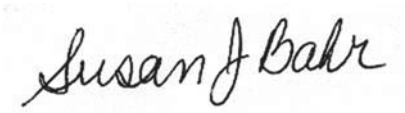
Greetings:

Enclosed is the redacted joint CPNI Certificate for the captioned companies. In accordance with a telephone call I received from Tanishia Proctor, Enforcement Bureau, in February 2011, I am filing this document twice via ECFS, once for each of the companies in the joint filing.

A joint request for confidentiality along with the unredacted joint CPNI Certificate is being filed on paper.

If you have any questions, please contact me.

Respectfully submitted,



Susan J. Bahr

Enclosures

TO: Marlene Dortch, Secretary
Federal Communications Commission

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

Date filed: February 19, 2015

Name of company covered by this certification: Franklin Telephone Co., Inc. and FranklinVT, LLC

Form 499 Filer ID: 809840 / 824340

Name of signatory: Kimberly Gates Maynard

Title of signatory: Treasurer

I certify that I am a corporate officer of the above Companies. Acting as an agent of the Companies, I hereby certify that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC's) rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

- Attached to this certification is Statement #1 explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

- No actions were taken against data brokers in the past year.

- In Statement #2, we discuss the processes that pretexters are using to attempt to access CPNI.

- In Statement #3, we explain additional procedures that the Companies are taking to protect CPNI.

- There have been no customer complaints in the past year concerning the unauthorized release of CPNI.

The Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

A copy of this Certificate and Statements, but with redactions in Statements 2 and 3, is being filed for public inspection. In addition, this Certificate with unredacted Statements is being filed with a Request for Information to Be Withheld from Public Inspection.

If you have questions, please contact: Susan Bahr, Esq., 10301 Strathmore Hall St Ste 421, North Bethesda, MD 20852, sbahr@bahrlaw.com, (301) 926-4930.

Name (signature): _____

Date: February 17, 2015

STATEMENT #1
CPNI PROCEDURES

1. **To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without Customer approval, the Companies employ the following procedures.**

The Companies have not used and do not plan to use CPNI for marketing. The Companies do limited to no marketing – and do not use CPNI for that marketing.

2. **To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Companies employ the following procedures.**

The Companies do not use, disclose or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, the Companies do not send notifications or request corresponding approvals from their customers. The Companies do not use joint venture partners or independent contractors for marketing purposes.

3. **To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Companies employ the following procedures.**

The Companies use one and only one customer service representative (CSR), who attends regional training programs on a regular basis. We have an express disciplinary process in place to handle any instances where improper use is made of CPNI. This process could include a write up on the employee's record and retraining in CPNI procedures. We have a supervisory review process regarding compliance with the CPNI rules; we retain records of compliance as required by the rules, and sales personnel obtain supervisory approval of proposed requests for opt-out approvals.

4. **To ensure compliance with Section 64.2010 of the FCC's CPNI**

rules, concerning safeguards for disclosing CPNI, the Companies have employed the following procedures ever since Section 64.2010 went into effect.

Telephone access to call detail information is provided only in accordance with the guidelines established in the CPNI rules. The Companies are working with customers to establish passwords and back-up authentication methods, if requested by the customers. Telephone access to non-call detail information is provided after the customer is authenticated. In-store access to CPNI is provided after a customer provides a valid photo ID. The Companies do not provide online access to CPNI. The Companies do not have contracts with business customers and therefore do not need to make modifications to provide alternative authentication regimes. Whenever account information changes as specified in Section 64.2010, the Companies immediately notify the customer, usually via a telephone call..

5. **To ensure compliance with Section 64.2011 of the FCC's CPNI rules, concerning notifications of security breaches, the Companies employ the following procedures.**

All staff have been trained in procedures to follow to report breaches internally. We have had no breaches since this rule went into effect. When a breach is confirmed, the appropriate regulatory personnel are prepared to make the required notifications to the United States Secret Service, the Federal Bureau of Investigation, and the customer, as required and permitted under Section 64.2011. Records of such breaches and the corresponding notifications are maintained for at least two years.

STATEMENT #2
PROCESSES PRETEXTERS ARE USING TO ATTEMPT TO ACCESS CPNI

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STATEMENT #3
HOW CPNI IS PROTECTED

In addition to following all the procedures described herein and in the FCC's CPNI rules, other steps that the Companies take to ensure that CPNI is protected include:

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