**REDACTED –**
**FOR PUBLIC INSPECTION**

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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
Geneseo Telephone Company, Cambridge Telephone Company, Henry County Telephone Company, Cambridge Telcom Services, Inc., Celebrate Communications, LLC.
Form 499 Filer ID: 808200, 805719, 805722, 816696, 808201

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 five times 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

Susan J. Bahr, Esq.

Enclosures

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TO: Marlene Dortch, Secretary
Office of the 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(s) covered by this certification: Geneseo Telephone Company, Cambridge Telephone Company, Henry County Telephone Company, Cambridge Telcom Services, Inc., Celebrate Communications, LLC.

Form 499 Filer ID: 808200, 805719, 805722, 816696, 808201

Name of signatory: Scott Rubins

Title of signatory: President & CEO

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.

- The Companies have not taken any actions 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.

- The Companies have not received any 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): _____ 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.**

Our marketing sometimes consists of using bill inserts and direct mail – which is sent to all customers. No CPNI customer approvals are needed for this marketing. We also may use CPNI in situations that do not require customer approval, such as marketing calling features to existing local exchange customers.

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 request opt-out approval in accordance with the CPNI rules. Using that consent, the Companies sometimes market services to customers as allowed by the CPNI rules. For example, the Companies may market long distance service to local exchange customers who have not opted out. We provide all required notices to customers on a biannual basis, and we provide such notices prior to any solicitation for customer opt-out approval. We record the customers' choices by a record indicator in the billing system. That information is readily available to the customer service representatives and marketing staff, as needed. 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 provide periodic training sessions to our personnel to ensure they are aware of when they are and are not authorized to use CPNI. The training consists of hour-long meetings with all customer service specialists. We have an express disciplinary process in place to handle any instances where improper use is made

of CPNI. This process involves written warnings and potential termination of employment for violation. For those instances where we do use CPNI for marketing purposes, we maintain records of those marketing campaigns with the details and retention periods required by the CPNI rules. 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 any proposed outbound marketing 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 without a customer provided password. The Companies do not have access to this password other than to reset it at the customer's directive. Whenever account information changes as specified in Section 64.2010, the Companies immediately notify the customer, usually via a letter mailed to the existing address of record.

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.

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## STATEMENT #2

## PROCESSES PRETEXTERS ARE USING TO ATTEMPT TO ACCESS CPNI

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**STATEMENT #3**
**<u>HOW CPNI IS PROTECTED</u>**

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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