FlatRock
TELEPHONE CO-OP, INC.

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February 2, 2006

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB-06-TC-060
CPNI Compliance Certification
Flat Rock Telephone Co-Op, Inc.

Dear Ms. Dortch:

This filing is intended to respond to the Commission's directive to file on or before February 6, 2006, Flat Rock Telephone Co-Op, Inc. ("Company") Customer Proprietary Network Information ("CPNI") Compliance Certification.

It is our policy to protect the confidential CPNI of our customers, other telecommunications carriers, and equipment manufacturers and we believe, in good faith, that our efforts have advanced this underlying objective.

When responding to the Commission's recent Public Notice, DA 06-223 (Jan. 30, 2006), the Company undertook with counsel and management consultants a review of our CPNI practices. As a result of this review, we have identified steps that will assist the Company's continuing compliance with CPNI as well as areas that will require additional steps in order for the Company to be able to execute the certification required by 47 CFR 64.2009(e). Accordingly, erring on the side of caution, the Company submits the attached Certification. In this Certification, the Company, in good faith, attests that the Company is undertaking current actions to ensure compliance. The Company also commits to submit a supplementary updated filing at a future date when its internal review is completed. Attached to this filing is a Company Policy and Operating Guidelines that the Company is utilizing in this process.

We note at this point that the Company takes seriously its obligation to protect the confidential nature of its CPNI, and we are unaware of our activities that are connected recently publicized "brokering" activities that would implicate, contemplate, or otherwise compromise the confidentiality of our customers' CPNI.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

Kevin J. Jacobsen
Executive Vice President

CERTIFICATION

I, Kevin J. Jacobsen, Executive Vice President of Flat Rock Telephone Co-Op, Inc. (the "Company") do hereby declare under penalties of perjury that I am an officer of the Company and that (1) the Company is undertaking current actions to ensure full compliance with applicable FCC Rules, and (2) intends to submit a supplementary updated filing at a future date when the internal review is completed. This information is true and accurate to the best of my knowledge, information, and belief.

Signature

2/2/06

Date

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Flat Rock Telephone Co-Op, Inc.
STATEMENT OF COMPANY POLICY

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of Flat Rock Telephone Co-Op, Inc.

Flat Rock Telephone Co-Op, Inc. (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.

- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.

- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 CFR 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.

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CPNI OPERATING GUIDELINES

Flat Rock Telephone Co-Op, Inc. (Company) adheres to the following guidelines:

General Company Policies

The Company uses, discloses, or permits access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

The Company uses, discloses, or permits access to CPNI for the purpose of providing or marketing service offerings among the categories of service (*i.e.*, local, interexchange, and CMRS) to which the customer already subscribes from the Company, without customer approval.

The Company shares CPNI only among the carrier's affiliated entities that provide a service offering to the customer. Except as noted herein, the Company does not share CPNI with its affiliates from which its customer does not take service.

The Company does not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from the Company, unless the Company has customer approval to do so, except in accordance with exceptions described below that are consistent with 47 CFR § 64.2006(c), where such disclosure is related to inside wiring, maintenance, and repairs; CMRS-related health research; and the marketing of adjunct-to-basic services.

A wireline carrier affiliate of the Company, as may exist, uses, discloses or permits access to CPNI derived from its provision of local exchange service or interexchange service, without customer approval, for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

The Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. For example, the Company does not use local service CPNI to track all customers that call local service competitors.

The Company uses, discloses, or permits access to CPNI, without customer approval in its provision of inside wiring installation, maintenance, and repair services.

The Company uses CPNI, without customer approval, to market our services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

Company Policy Governing the Approval Required for Use of Customer Proprietary Network Information.

The Company obtains approval through written, oral or electronic methods, and we understand that the Company bears the burden of demonstrating that such oral approval has been given in compliance with the applicable FCC Rules.

The customer's approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by the Company remains in effect until the customer revokes or limits such approval or disapproval.

The Company maintains records of approval, whether oral, written or electronic, for at least one year.

The Company may seek alternatively either "opt-in" or "opt-out" approval consistent with applicable FCC requirements in order to obtain authorization to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. The Company, subject to opt-out approval or opt-in approval, may disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents; its affiliates that provide communications-related services; and its joint venture partners and independent contractors. The Company also permits such persons or entities to obtain access to such CPNI for such purposes. Any such disclosure to or access provided to joint venture partners and independent contractors is undertaken in compliance with Joint Venture/Contractor safeguards set forth below:

Joint Venture/Contractor Safeguards: The Company discloses or provides access to CPNI to its joint venture partners or independent contractors only upon the execution of confidentiality agreements with independent contractors or joint venture partners that comply with the following requirements. The confidentiality agreement shall:

(i) Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which that CPNI has been provided;

(ii) Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

(iii) Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

Except for use and disclosure of CPNI that is permitted without customer approval under 47 CFR § 64.2005, or that is described above, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, the Company uses, discloses, or permits access to its customer's individually identifiable CPNI subject to opt-in approval only.

Company Policies Regarding the Notice Required for Use of Customer Proprietary Network Information.

Prior to any solicitation for customer approval, the Company provides notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

The Company maintains records of the customer's notification, whether oral, written or electronic, for at least one year.

The Company provides individual notice to customers when soliciting approval to use, disclose, or permit access to customers' CPNI.

The customer notification provides sufficient information to enable the customer to make an informed decision as to whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI.

The notification states that the customer has a right, and the Company has a duty, under Federal law, to protect the confidentiality of CPNI.

The notification specifies the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and informs the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

The notification advises the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and states clearly that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may from time-to-time provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI, *i.e.*, lack of ability to market certain services that may be of interest to the subscriber.

The Company ensures that the notification is comprehensible and must not be misleading.

The Company uses clearly legible, sufficiently large type, and adequate placement in an area so as to be readily apparent to a customer for all written notices.

If any portion of a notification is translated into another language, then all portions of the notification are translated into that language.

The Company may from time-to-time state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Company also may from time-to-time state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

The Company does not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

The Company states in the notification that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

The Company shall ensure that any solicitation for approval is proximate to the notification of a customer's CPNI rights.

Alternatively, the Company may from time-to-time seek "opt-out" authorization, which shall include the Company's notification to obtain opt-out approval through electronic or written methods, but not by oral communication, except for "one time use," as described below, and contents of any such notification shall comport with the ten standards set forth below:

1. The notification states that the customer has a right, and the carrier has a duty, under federal law, to protect the confidentiality of CPNI.

2. The notification specifies the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.

3. The notification advises the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may from time-to-time provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to

CPNI, *i.e.*, lack of ability to market certain services that may be of interest to the subscriber.

4. The Company ensures that the notification is comprehensible and must not be misleading.

5. The Company uses clearly legible, sufficiently large type, and adequate placement in an area so as to be readily apparent to a customer for all written notices.

6. If any portion of a notification is translated into another language, then all portions of the notification are translated into that language.

7. The Company may from time-to-time state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Company also may from time-to-time state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

8. The Company does not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

9. The Company states in the notification that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.

10. The Company shall ensure that any solicitation for approval is proximate to the notification of a customer's CPNI rights.

The Company waits at least 30 days after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI ,and the Company notifies customers as to the applicable waiting period for a response before approval is assumed.

If the Company utilizes an electronic form of notification, then the waiting period begins to run from the date on which the notification was sent.

If the Company issues a notification by mail, then the waiting period shall begin to run on the third day following the date that the notification was mailed.

If the Company uses the opt-out mechanism, then it provides notices to its customers every two years.

If the Company uses e-mail to provide opt-out notices, then it employs the following standards in addition to the requirements generally applicable to notification:

> The Company obtains express, verifiable, prior approval from consumers to send notices via e-mail regarding their service in general, or CPNI in particular;
>
> The Company allows customers to reply directly to e-mails containing CPNI notices in order to opt-out;
>
> Opt-out e-mail notices that are returned to the Company as undeliverable are sent to the customer in another form before the Company may consider the customer to have received notice;
>
> The Company ensures that the subject line of the message clearly and accurately identifies the subject matter of the e-mail; and
>
> The Company makes available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. The Company may from time-to-time accomplish this through a combination of methods that in sum provide all customers with the ability to opt-out at no cost and to effectuate that choice whenever they choose.

The Company provides notification to obtain opt-in approval through oral, written, or electronic methods. The contents of any such notification comply with the standards set forth above, numbered 1-10.

The Company uses oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether carriers use opt-out or opt-in approval based on the nature of the contact. The contents of any such notification comply with the standards set forth above, numbered 1-10, except that the Company may omit any of the following notice provisions if not relevant to the limited use for which the carrier seeks CPNI: The Company does not advise customers if they have opted-out previously, since no action is needed to maintain the opt-out election; the Company does not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party; the Company does not disclose the means by which a customer can deny or withdraw future access to CPNI, and the Company explains to customers that the scope of the approval that the Company seeks is limited to one-time use; and; the Company omits disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, since the Company communicates clearly that the customer can deny access to his CPNI for the call.

Company Policies Regarding Safeguards for Use of Customer Proprietary Network Information.

The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company trains its personnel as to when they are and are not authorized to use CPNI, and the Company has an express disciplinary process in place.

The Company maintains a record, electronically or in some other manner, of its own and, as may exist, its affiliates' sales and marketing campaigns that use its customers' CPNI. The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company retains the record for a minimum of one year.

The Company has a supervisory review process regarding its compliance with applicable FCC rules for outbound marketing situations and maintains records of its compliance for a minimum period of one year. Sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. The notice will be in the form of a letter, and will include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. This notice will be submitted even if the carrier offers other methods by which consumers may opt-out.

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