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February 3, 2006

**VIA ECFS**

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

**Re: OpticTel Long Distance, LLC, Certification of CPNI Filing (February 3, 2006) *EB Docket Nos. 06-36, EB-06-TC-060***

Dear Ms. Dortch:

Pursuant to the Commission's Public Notices issued January 30, 2006 and February 2, 2006 in the above-captioned proceedings, OpticTel Long Distance, LLC submits the attached CPNI certification.

If you have questions regarding this matter, please contact the undersigned at (202) 637-2262.

Sincerely,



Karen Brinkmann

Enclosures

EB-06-TC-060

**CERTIFICATION OF CPNI FILING  
FEBRUARY 6, 2006**

I certify that I am an officer of OpticTel Long Distance, LLC; and I have personal knowledge that OpticTel Long Distance, LLC has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.

Danny B. Overland  
Officer's Printed Name

  
Officer's Signature

VP/Manager  
Title

3 February 2006  
Date

## STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

OpticTel Long Distance, LLC's operating procedures ensure that OpticTel Long Distance, LLC is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.

OpticTel Long Distance, LLC has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of OpticTel Long Distance, LLC that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to *disciplinary action, and possible termination*. We also ensure that our vendors that lawfully have access to our customer CPNI, such as our billing company, are aware of the CPNI rules.

Other than the exceptions for use of CPNI being customer approval, as required by law, and the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009, CPNI is not used by OpticTel Long Distance, LLC without customer notification and approval as set forth below.

**Opt-In Notice** – This method is required for disclosure of CPNI to unrelated third-parties or to affiliated carriers that do not provide communications-related services. This requires the carrier obtain the customer's express, affirmative consent allowing the use and release of CPNI. This does not apply to subscriber listing information given to other carriers for telephone directories pursuant to FCC Rules.

**Opt-Out Notice** – This method is required for disclosure of CPNI to affiliated entities providing communications-related services, as well as third party agents and joint venture partners providing *communications related services*. Under this method, the customer is deemed to have consented to the use, disclosure or access to the customer's CPNI if the customer has failed to object thereto within a minimum of 30 days from receiving notice.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.