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*NOT ADMITTED IN VA

February 3, 2006

WRITER'S DIRECT DIAL
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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Certification of CPNI Filing
EB 06-TC-060

Dear Ms. Dortch:

On behalf of Smith Bagley, Inc. transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, dated January 30, 2006 and Section 64.2009(e) of the Commission's rules, is the compliance certification and accompanying statement for the year ended December 31, 2005.

Should any questions arise with respect to this matter, please communicate directly with this office.

Very truly yours,



B. Lynn F. Ratnavale

c: BCPI

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau, FCC

Certification of CPNI

I, Richard L. Watkins, hereby state and declare:

1. I am the Chief Operating Officer of Smith Bagley Inc., d/b/a Cellular One of NE Arizona, a wireless telecommunications services operator.

2. As an officer of Smith Bagley Inc., d/b/a Cellular One of NE Arizona, I certify that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's Customer Proprietary Network Information ("CPNI") rules at Part 64.2001, *et seq.*

3. I am familiar with the facts contained in the foregoing Statement of CPNI Procedures and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1st day of February, 2006

A handwritten signature in black ink, appearing to read 'Richard L. Watkins', is written over a horizontal line.

Richard L. Watkins
Chief Operating Officer

Statement of CPNI Operating Procedures

**Smith Bagley Inc., d/b/a Cellular One of NE Arizona (SBI)
Certification of CPNI Filing February 1, 2006
EB-06-TC-060**

Carrier Name, Address, Phone Number, Contact Person

Smith Bagley Inc., d/b/a Cellular One of NE Arizona
1500 S. White Mountain Road, Suite 103
Show Low, Arizona 85901

(928) 537-0690

Richard L. Watkins
Chief Operations Officer

Smith Bagley Inc., ("Carrier"), a telecommunications carrier, has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented an internal system whereby the status of a customer's CPNI approval can be determined prior to the use of the information.
- Carrier continually trains its employees regarding the appropriate use of CPNI. Additionally, Carrier has established disciplinary procedures should any employee violate the CPNI procedures established by the Carrier.
- Carrier maintains a record of its and any affiliates' use of customer CPNI for any type of marketing of sales campaigns. Carrier also maintains a record of any and all instances where CPNI was provided to any third party, or where a third party was allowed access to CPNI.
- Carrier has established a review process regarding compliance with the CPNI rules with the respect to outbound marketing situations and maintains records of compliance for a minimum of one year. Specifically, Carrier's sales and customer service personnel obtain supervisory approval for any proposed outbound marketing request for customer approval

regarding its CPNI.

- In accordance with Section 64.2009(e) of the Commission's rules, an officer of the Carrier has executed a compliance certificate stating that the officer has personal knowledge that Carrier has established operating procedures that ensure compliance with the Commission's CPNI rules.