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February 6, 2006

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Marlene Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Cheyenne River Sioux Tribe Telephone Authority  
EB-06-TC-060  
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Cheyenne River Sioux Tribe Telephone Authority, of Eagle Butte, SD, submitted herewith is its certification and statement, pursuant to Section 64.2009(e) of the Commission's Rules, in accordance with the Commission's Public Notice, released February 2, 2006 (DA 06-258).

Please refer any questions concerning this filing to undersigned counsel.

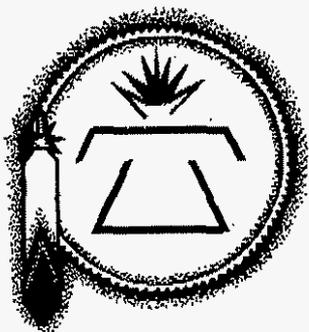
Very truly yours,



Harold Mordkofsky

Attachments

Cc: Byron McCoy, Enforcement Bureau, FCC (via email)  
Best Copy and Printing, Inc. (via email)



# C.R.S.T Telephone Authority

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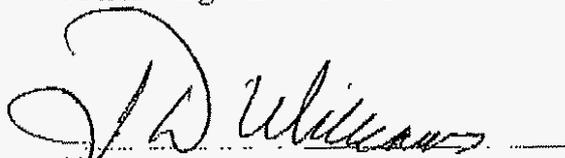
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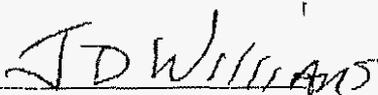
## CERTIFICATION OF CPNI FILING, FEBRUARY 6, 2006 [Section 64.2009(e) of FCC Rules]

EB-06-TC-060  
EB DOCKET NO. 06-36

I hereby certify that I am an officer of the Cheyenne River Sioux Tribe Telephone Authority and that I have personal knowledge that the Tribe has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. §§64.2001 through 64.2009). The attached Statement of CPNI Compliance explains how the Tribe's operating procedures ensure that it is in compliance with the foregoing FCC rules.

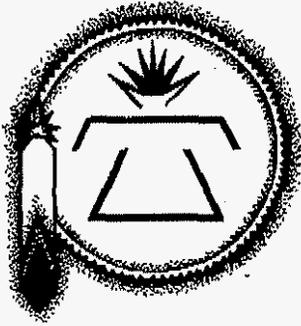
I am making this certification for 2006.

  
Signature

JD Williams   
Printed Name

General Manager \_\_\_\_\_  
Office Held

February 6, 2006 \_\_\_\_\_  
Date



# ***C.R.S.T Telephone Authority***

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## **Cheyenne River Sioux Tribe Telephone Authority Statement of CPNI Compliance**

The Cheyenne River Sioux Tribe Telephone Authority provides *telecommunications* services to the Cheyenne River Sioux Reservation in north-central South Dakota. The following statement explains how the Tribe ensures that its operating procedures and employee conduct are in compliance with the FCC's rules governing its Customer Proprietary Network Information.

### **I. Customer Proprietary Network Information ("CPNI")**

CPNI is defined in Section 222(l) of the Communications Act as (A) 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; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a customer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a customer; (b) the length of a customer's phone calls, and (c) the telecommunications and information services purchased by a customer.

### **II. Use of CPNI Is Restricted**

In providing telecommunications services, the Tribe recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Tribe.

Tribe employees and agents that may deal with CPNI have and will continue to be informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order

to be authorized to use or access the Tribe's CPNI, employees and agents receive training with respect to the FCC's CPNI rules.

### III. Permissible Uses of CPNI

Company employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the Company, except as follows:

1. The Company may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. All such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, the Tribe may provide the customer's phone records or other CPNI to a law enforcement agency but only in response to a lawful warrant or subpoena that specifies the particular CPNI to be furnished.

3. Otherwise, the Tribe does not use its CPNI for any purpose other than billing its customers, except as shown in items 4 and 5 below.

4. The Company and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications services from which the CPNI is derived.

a. The FCC has noted the publishing of directories as an example of this permitted use.

b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.

c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

d. No other uses of CPNI are permitted. However, the Tribe may use CPNI to protect the Tribe's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

5. The Tribe may use, disclose, or permit access to CPNI derived from its provision of local exchange service or long distance service, without the customer's approval, to provide

customer premises equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

6. The Tribe presently does not allow use of its CPNI by its cable TV affiliate and will not allow such use by any other affiliate. However, the Tribe does not foreclose the possibility that it may in the future allow such use by an affiliate, but only in accordance with the 'opt-in, opt-out' procedures in Sections 64.2007 and 64.2008 of the FCC's Rules.

#### **IV. Disciplinary Procedures**

The Company has informed its employees and agents that it considers compliance with the Tribe's procedures regarding the use, disclosure, and access to CPNI to be very important. Violations of these procedures and other policies and procedures regarding the Tribe's provision of telecommunications services to the Cheyenne River Sioux Reservation will subject the offenders to appropriate disciplinary action depending upon the nature and circumstances of the violation.