



Cincinnati Bell  
Telephone®

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Cincinnati, OH 45201-2301

February 6, 2006

**FILED ELECTRONICALLY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: Certification of CPNI Filing (February 6, 2006)  
EB Docket 06-36**

Dear Secretary Dortch:

Pursuant to DA 06-258 and section 64.2009(e) of the Commission's rules, Cincinnati Bell Inc., on behalf of its subsidiaries, hereby files its certificate and accompanying statement demonstrating compliance with the Commission's rules protecting the privacy of customer proprietary network information ("CPNI"), 47 C.F.R. §§ 64.2001-2009.

If you have any questions or concerns regarding the certification or statement, please do not hesitate to contact me at (513) 397-7260.

Sincerely,

A handwritten signature in cursive script that reads "Jouett Kinney".

Jouett Kinney  
Government Relations

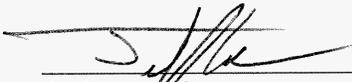
cc: Bryon McCoy by email to [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing by email to [fcc@bcpi.com](mailto:fcc@bcpi.com)

**CERTIFICATION**

I, Jeffery Coleman, hereby certify this 6 day of February, 2006, that I am an officer of Cincinnati Bell Inc. and that I have personal knowledge that Cincinnati Bell Inc. and its subsidiaries have established operating procedures that are adequate to ensure compliance with the Commission's rules for protecting the privacy of customer proprietary network information ("CPNI"), 47 C.F.R. §§ 64.2001-2009.

Jeffery Coleman  
Officer's Printed Name

Vice President, Internal Controls  
Officer's Title

  
Officer's Signature

**CINCINNATI BELL INC.**  
**STATEMENT REGARDING CPNI OPERATING PROCEDURES**  
**February 6, 2006**

This statement is filed on behalf of Cincinnati Bell Inc. ("CBI") and the following subsidiaries: Cincinnati Bell Telephone Company LLC ("CBT"), an incumbent local exchange carrier; Cincinnati Bell Any Distance Inc. ("CBAD"), an interexchange carrier; Cincinnati Bell Extended Territories LLC ("CBET"), a competitive local exchange carrier; and Cincinnati Bell Wireless LLC ("CBW"), a wireless service provider.

CBI continually educates and trains its employees on the appropriate use of customers' CPNI. As set forth in CBI's Corporate Policies Manual, it is the policy of CBI to protect the confidentiality of all CPNI in its possession in accordance with Section 222 of the Telecommunications Act of 1996. In addition, CBI's Code of Business Conduct states that employees are required to safeguard any proprietary information received from customers or potential customers as though it were the company's own information. Each year, salaried employees are required to sign a statement acknowledging that the employee has received a copy of the Code of Business Conduct and that the employee has been advised to read the code, become familiar with its contents and abide by the rules and principles set forth in it. Similarly, all hourly employees are provided a copy of the code and are instructed to read and become familiar with its contents. Supervisors of hourly employees are required to sign an attendance roster indicating that the hourly employees participated in awareness training and to submit the roster to the Human Resources Department. The Code of Conduct clearly states that breaches of the principles contained in the policy are grounds for disciplinary action, including dismissal, and may carry penalties under federal and state laws.

In addition to general employee education on the protection of CPNI and customer information, CBI's sales consultants are trained to recognize when a customer has or has not approved of the use CPNI for marketing purposes as indicated by the customer's service record. If a customer has not previously approved of the use of CPNI for marketing purposes, either by opt-in approval or opt-out approval, sales consultants are trained to request the customer's permission to access the customer's records during the call as necessary.

CBI also complies with the Commission's requirement to establish a supervisory review process for outbound marketing processes. Specifically, marketing personnel must submit a request to obtain customer information in order to conduct an outbound campaign. The request must indicate the parameters of the data sought, other key information about the campaign, as well as by whom the request is made. The information requested is retrieved by designated personnel and scrubbed to eliminate customers who elect not to share CPNI or who have requested to be placed on the company's do-not-call/contact list. CBI maintains a record of all sales and marketing campaigns that use customers' CPNI as required by Section 64.2100(c).

Finally, CBI notifies customers of its responsibilities and of customer rights related to CPNI and obtains customer approval to use or disclose CPNI for marketing purposes. With respect to most customers, CBI has used an opt-in approach to obtain customer approval. In the case of CBT residential customers, however, the company uses the opt-out approval method established by the Commission's rules. (Where CBT employs an opt-out approval method, CBT

sends the required notice to customers every two years as required by the rules.) Moreover, Cincinnati Bell informs all customers of its CPNI policy by its website, [www.cincinnati-bell.com](http://www.cincinnati-bell.com), which provides customers with an opportunity to approve of the use of CPNI as described in the notice as well as information on how the customer can change his or her mind with respect to a prior designation.