



7852 Walker Drive, Suite 200, Greenbelt, MD 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

RECEIVED

FEB - 6 2006

Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

**Chickamauga Tel. Corp. 499 Filer ID 805902
Diamond Telephone Services, Inc. 499 Filer ID 815904
Fulton Tel. Co. Inc. 499 Filer ID 804741
GulfPines Communications, LLC 499 Filer ID 819216
Mound Bayou Tel. and Communications Inc. 499 Filer ID 804726**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

**Copies: 4 additional copies to Secretary
Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)**

No. of Copies rec'd 044
List A B C D E

**Echelon Building II, Suite 200
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
Fax: 512-346-0822**

**Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve
Eagan, Minnesota 55121
Phone: 651-452-2660
Fax: 651-452-1909**

**547 South Oakview Lane
Bountiful, UT 84010
Phone: 801-294-4576
Fax: 801-294-5124**

**4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
Phone: 770-569-2105
Fax: 770-410-1608**

FAIL COMPANIES

Chickamauga Tel. Corp. 499 Filer ID 805902
Diamond Telephone Services, Inc. 499 Filer ID 815904
Fulton Tel. Co. Inc. 499 Filer ID 804741
GulfPines Communications, LLC 499 Filer ID 819216
Mound Bayou Tel. and Communications Inc. 499 Filer ID 804726

12 Third Street, P.O. Box 922, Bay Springs, Mississippi 39422 (706) 375-3195

CERTIFICATION

I am an officer of the Fail, Inc., parent company for the telecommunications carriers listed above (collectively the "Company"). I hereby certify that I have personal knowledge that the Company is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.¹ Accompanying this certificate is a statement explaining how the Company is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Charles F. Fail
President
Fail, Inc.
February 3, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

FAIL COMPANIES

Chickamauga Tel. Corp. 499 Filer ID 805902
Diamond Telephone Services, Inc. 499 Filer ID 815904
Fulton Tel. Co. Inc. 499 Filer ID 804741
GulfPines Communications, LLC 499 Filer ID 819216
Mound Bayou Tel. and Communications Inc. 499 Filer ID 804726

12 Third Street, P.O. Box 922, Bay Springs, Mississippi 39422 (706) 375-3195

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how the companies listed above (collectively the "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has informed employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Section 64.2003(d) of the FCC's Part 64, Subpart U CPNI rules.

2. Customer Notification and Authorization Process

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the Section 64.2007(f)(2).

3. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

4. Record Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

5. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.