



DOCKET FILE COPY ORIGINAL

February 3, 2006

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

RE: EB-06-TC-060; EB Docket No. 06-36

Dear Ms. Dortch:

Randolph Telephone Company (Randolph) respectfully files the enclosed CPNI compliance certification. Randolph is filing the CPNI compliance certification in compliance with the Enforcement Bureau's Public Notice released January 30, 2006 (DA 06-223). The certification has been made by an officer of Randolph Telephone Company pursuant to the Commission's rules for sworn statements.

Enclosed are the original and five (5) copies of the CPNI compliance certification. Also enclosed is an additional copy of this transmittal letter. Please stamp "FILED" and return as proof of filing in the enclosed self-addressed postage-paid envelope. If you have any questions regarding the CPNI compliance certification of Randolph Telephone Company, please contact me at (336) 622-7924.

Sincerely,

A handwritten signature in cursive script that reads 'Jean Thaxton'.

Jean Thaxton
Regulatory Director

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau
Best Copy and Printing (BCPI)

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Randolph Telephone Company
CERTIFICATION

I am Steve A. Cox of Randolph Telephone Company. I hereby certify that I have personal knowledge that Randolph Telephone 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 Randolph Telephone 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.

Name: Steve A. Cox
Title: General Manager
Date: 02-03-06

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

Randolph Telephone Company
Randolph Telephone Telecommunications, Inc.

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Randolph Telephone Company (“RTC”) family of companies (collectively, the Company) is 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).

1. Integrated Nature of CPNI Practices

The Company is a family of affiliated companies providing telecommunications services. FCC rules require that the Company has separate affiliates for some services, but allows those separate affiliates to have common employees. Randolph Telephone Company is made up of the incumbent local exchange company, a long distance subsidiary and Internet group. Customers may not always be aware that different, individual affiliates of the Company provide them with specific telecommunications services. The Company’s affiliates include the following companies:

Randolph Telephone Telecommunications, Inc.

No matter which of the Company’s affiliates provides a service, the employees of a single affiliate may provide customer service and support to the customers of the other affiliates. In other cases, employees may be dedicated to a single Company affiliate but still rely on operational support systems common to all of the Company’s affiliates. Thus, the Company’s practices for complying with the FCC’s CPNI rules are on an integrated Company basis. References to “employees” in this document refer to employees of the Company as a whole.

2. Identification of CPNI

The Company has established procedures and trained 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 Part 64, Subpart U, Section 64.2003(d).

3. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI. These services are:

Telecommunications Services:

- Local (ILEC)
- Interexchange (long distance)

Non-telecommunications Services

- Internet
- Voice Mail

Inside Wiring

CPE (Customer Premise Equipment)

4. Identification of Permissible Uses of CPNI Without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

5. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

6. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008.

7. Training

The Company has trained existing employees having access to, or occasion to use CPNI, as to when they are and are not authorized to use CPNI. For new employees having access to, or occasion to use CPNI, the Company will include such training as part of employee orientation and training.

8. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

9. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.