



Prairie Grove Telephone Company

139 N. Mock Street, P.O. Box 1010  
Prairie Grove, AR 72753  
Phone: (479) 346-7200 Fax: (479) 267-1112  
www.pgteleco.com

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February 2, 2006

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

RE: Prairie Grove Telephone Company  
499 Filer ID: 803307  
FRN: 0001-7326-68  
Certification of CPNI Procedures and  
Statement of Compliance Concerning CPNI Rules  
EB Docket No. 06-36 and EB-06-TC-060;  
Certification of CPNI  
Filing Due Date: February 6, 2006

Dear Ms Dortch:

Pursuant to Commission's Public Notice of January 30, 2006 (DA 06-223), the Public Notice of February 2, 2006 (DA-258), and 47 C.F.R. Section 64.2009(e) the undersigned, an officer of the Company has established and implemented policies and procedures to ensure that it complies with the Commission's rules regarding customer proprietary network information ("CPNI") found in 47 C.F.R. Part 64, Subpart U, with respect to all services subject thereto.

These policies and procedures are outlined in the attached Statement of Compliance and the Company's compliance with those procedures are made by a Certification of CPNI procedures which are also an attachment to this letter.

This letter and its attachments are being sent to constitute the Company's filing required by the above referenced public notice.

Sincerely,

Tyrus R Reed

cc. Byron McCoy, Enforcement Bureau  
Best Copy and Printing, Inc

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**FCC FILING CONCERNING  
CUSTOMER PROPRIETARY NETWORK INFORMATION  
(HEREINAFTER "CPNI")**

Prairie Grove Telephone Company

(Company Name)

499 Filer ID: 803307

FRN: 0001-7326-68

**In response to EB Docket No. 06-36 and EB-06-TC-060  
Public Notice: DA 06-223 and DA 06-258**

**CERTIFICATION OF CPNI PROCEDURES  
FEBRUARY 6, 2006**

On behalf of Prairie Grove Telephone Company (hereinafter "The Company"). I certify the following:

1. I am an officer of the Company.
  
2. I am familiar with the CPNI operating procedures of the Company. I have personal knowledge that the operating procedures are being used by the Company and the operating procedures are adequate and specifically designed to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.
  
3. The Company maintains appropriate certification of its compliance with CPNI requirements and monitors operating procedures to ensure continued compliance.

Tyrus R Reed  
Officer's Printed Name

  
Officer's Signature

Secretary/Treasurer  
Title

2/02/2006  
Date

Prairie Grove Telephone Company

(Company Name)

499 Filer ID: 803307

FRN: 0001-7326-68

**In response to EB Docket No. 06-36 and EB-06-TC-060**

**Public Notice: DA 06-223 and DA 06-258**

**STATEMENT OF COMPLIANCE  
CONCERNING THE FCC'S  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

Prairie Grove Telephone Co (hereinafter "The Company") has operating procedures to ensure that the Company remains in compliance with the FCC's CPNI Rules. The Company and its employees are trained and understand that disclosure of or permitting access to our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.

The Company developed and has maintained internal procedures to educate our employees about CPNI, the prohibitions on disclosure, and the exceptions to the prohibited disclosure of CPNI. Our employees are instructed on the legal definition of CPNI including that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of the Company that is made available to the Company by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that the Company bills for received by our customers; except that such term does not include subscriber list information. All the Company employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination. The Company also ensures that our vendors that lawfully have access to our customer CPNI, such as a billing company or software provider, are aware of the CPNI rules and will not disclose CPNI information except as allowed by law.

Other than the permitted and legal use of CPNI such a by customer approval, as required by law, and the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009, CPNI is not used by the Company. The Company notifies customers of their right to restrict access to, use of, and disclosure of their CPNI. Periodic notices and one-time notices are provided as appropriate.

Such notices may be provided through multiple methods, such as bill inserts, notices published in the telephone directory, notices included on the Company's website, and oral notice provided during a telephone contact. The Company maintains records of all notices and approvals for at least one year.

Customer notification and approval methods if CPNI is ever used by the Company through customer approval is as set forth below:

Opt-In Notice – This approval method is required for disclosure of CPNI to unrelated third-parties or to affiliated carriers that do not provide communications-related services. This requires the Company to obtain the customer's express, affirmative consent allowing the use and release of CPNI. This does not apply to subscriber listing information given to other carriers for telephone directories pursuant to FCC Rules.

Opt-Out Notice- This method is required for disclosure of CPNI to affiliated entities providing communications-related services, as well as third party agents and joint venture partners providing communications related services. Under this method, the customer is deemed to have consented to the use, disclosure or access to the customer's CPNI if the customer has failed to object thereto within a minimum of 30 days from receiving notice.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

Tyrus R Reed  
Officer's Printed Name

  
Officer's Signature

Secretary/Treasurer  
Title

2/02/2006  
Date



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <http://www.fcc.gov>  
TTY: 1-888-835-5322

DA 06-223

Released: January 30, 2006

## Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications

In this Public Notice, the Enforcement Bureau (Bureau) directs all telecommunications carriers, including wireline and wireless carriers, to submit a compliance certificate to the Commission as required by section 64.2009(e) of the Commission's rules.<sup>1</sup> Carrier certificates for the most recent period, along with the accompanying statement explaining how their respective operating procedures ensure compliance with the rules, must be filed **no later than Monday, February 6, 2006**, in accordance with the procedures outlined below.

Section 222 of the Communications Act of 1934, as amended (the "Act"),<sup>2</sup> requires that telecommunications carriers protect the privacy of customer proprietary network information ("CPNI"). The Commission has initiated several inquiries into the procedures used by telecommunications carriers to ensure confidentiality of CPNI based on concerns regarding the apparent sale of telephone call records over the Internet. In furtherance of our investigations into this matter, the Commission directed several telecommunications carriers to submit compliance certificates they are obligated to prepare and maintain in accordance with section 64.2009(e) of the Commission's rules. After reviewing the submissions filed by these carriers, we find further investigation and review of all telecommunications carriers' most recent annual CPNI certifications is required.

### Filing Procedures

Carriers' reports, **to be filed on or before February 6, 2006**, must reference EB-06-TC-060 and should be labeled clearly on the first page as "Certification of CPNI Filing (date of filing)." The report may be filed using: (1) the Commission's Electronic Comment Filing System (ECFS), or (2) by filing paper copies. *See* Electronic Filing of Documents in Rulemaking Proceedings, 63 Fed. Reg. 24,121 (May 1, 1998).

- **Electronic Filers:** Compliance letters may be filed electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/>. Filers should follow the instructions provided on the website for submitting comments. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number (WC Docket No. 05-196).

<sup>1</sup> 47 C.F.R. §64.2009(e).

<sup>2</sup> 47 U.S.C. §222.

- Paper Filers: Parties that choose to file by paper must file an original and four copies of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Washington, DC 20554.
- The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, N.E., Suite 110, Washington, DC 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, SW, Washington DC 20554.

Parties should also send a copy of their filings to:

- Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12th Street, S.W., Washington, D.C. 20554, or by email to [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov).

Parties must also serve one copy with the Commission's copy contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, (202) 488-5300, or via e-mail to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com).

For further information regarding this request, press should contact Janice Wise, Director, Media Relations, Enforcement Bureau, (202) 418-8165, and carriers should contact Donna Cyrus, Telecommunications Consumers Division, Enforcement Bureau, (202) 418-7325, or Rosemary Cabral, Telecommunications Consumers Division, Enforcement Bureau, (202) 418-0662.

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