

## **nt Concerning the Protection of Customer Proprietary Network ormation for the Annual Period Ending December 31, 2005**

pendent Telecommunication Systems, Inc. is a telecommunications carrier subject to the requirements set forth in Section 64-2009 of the Commission's rules.

rsuant to said rules, ITS has established a system by which they can determine whether a customer has given their approval for the release or use of said customer's proprietary network information ("CPNI") prior to that information being used or released.

ormation protected by ITS includes information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecommunications service subscribed to by a customer and made available to ITS by the customer solely by virtue of the carrier-customer relationship. Also protected is information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

S personnel are trained as to when they are and are not authorized to release or use CPNI and violation of these rules will subject personnel to express disciplinary action.

S maintains a record of its' sales and marketing campaigns that use customers' CPNI. Further, record of all instances where CPNI was disclosed or provided to third parties or third parties were allowed access to CPNI is maintained by ITS . These records reflect a description of the campaigns, the specific CPNI used in the campaign and what products or services were offered as part of the campaign. These records are retained for a minimum of one year.

S has established a procedure whereby all sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI and records reflecting carrier compliance with the Commission Rules are maintained for a minimum of one year.

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**NOTIFICATION OF CPNI FILING DATED DECEMBER 31, 2005**

**EB-06-TC-060**

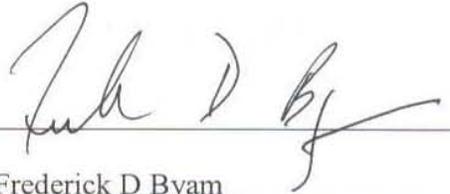
On behalf of IDENPENDENT TELECOMMUNICATION SYSTEMS, INC. ("ITS" in accordance with Section 64.2009(e) of the Commission's Rules, I hereby certify I have personal knowledge that ITS has established operating procedures that are intended to ensure compliance with the rules in Section 64.2009.

Further, I hereby certify that the attached statement explaining how the company's operating procedures ensure compliance with Section 64.2009 is true and correct.

Dated this 2<sup>nd</sup> day of February, 2006.

IDENPENDENT TELECOMMUNICATION SYSTEMS, INC.

By: \_\_\_\_\_



Name: Frederick D Byam

Title: Secretary

Date: 02/01/2006

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