KINGDOM
LONG DISTANCE

211 S. Main Street
P.O. Box 97
Auxvasse, Missouri 65231

(573) 386-2241
(800) 487-4811
Fax (573) 386-5520

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FEB - 6 2006
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February 2, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: EB-06-TC-060 & EB Docket No. 06-36
Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

Please find enclosed the original and 4 copies of our certification certificates and respective operating procedures related to rules regulating any use of "customer proprietary network information" by Kingdom Telephone Company d/b/a Kingdom Long Distance staff members.

I have also provided identical copies to:

✓Byron McCoy
Telecommunications Consumers Division
Enforcement Bureau
Federal Communications Commission
Room 4-A234
445 12th Street, S.W.
Washington, D.C. 20554

Best Copy and Printing, Inc. (BCPI)
PortalsII
445 12th Street, S.W.
Room CY-B402
Washington, D.C. 20554

If you have questions about this certification, please bring those questions to my attention.

Sincerely,

Randall H. Boyd
Asst. Board Secretary

Enclosures

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Statement of Explanation: CPNI Compliance

This accompanying statement explains how Kingdom Telephone Company d/b/a Kingdom Long Distance's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Kingdom adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- the training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
- the implementation of an express disciplinary process for CPNI violations;
- the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.

A copy of the subpart cited above is attached to this statement of explanation.

Certificate of Compliance: Customer Proprietary Network Information (CPNI)
RE: EB-06-TC-060 Certification of CPNI Filing – February 6, 2006

This certifies that the undersigned, as a corporate officer of Kingdom Telephone Company d/b/a Kingdom Long Distance, has personal knowledge that Kingdom Long Distance has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations.

Randall H Bgo

Signature

Title:___Asst. Board Secretary____

Date:___February 2, 2006_____

COPY

CUSTOMER PROPRIETARY NETWORK INFORMATION

Protecting the privacy of your service and usage records is your right and our duty under federal law. Kingdom Telephone Company, along with Kingdom Long Distance and other affiliates, are required to inform you that you can direct us not to use any of the information about the services you have purchased from Kingdom to offer you additional products and services. If you do not want us to use any of your service and usage information to offer you products and services, please call 1-800-487-4811 and have one of our customer service representatives note that on your records. There is no charge for electing to restrict your information. Proof of that election will be shown on your monthly bill as "Restricted CPNI".

If you do not restrict our use of your customer information by calling 1-800-487-4811, Kingdom can use your customer information to offer you products and services that you may find valuable based on your existing services.

Restricting your information will not affect the products you currently have with Kingdom and may not eliminate all marketing contacts. Even if you restrict the use of your information, it may be used to market services to you when you call us. Your election is valid until you affirmatively revoke or limit it.

UNDER NO CIRCUMSTANCES WILL KINGDOM SHARE THIS INFORMATION WITH ANOTHER PARTY, NOT AFFILIATED WITH KINGDOM, REGARDLESS OF WHETHER YOU RESTRICT KINGDOM'S USE OR NOT.

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KINGDOM TELEPHONE COMPANY d/b/a KINGDOM LONG DISTANCE

Customer Proprietary Network Information(CPNI)
Annual Compliance Certification
Reference: EB-06-TC-060 Certification of CPNI Filing February 6, 2006

I, Randall H. Boyd, Assistant Secretary of the Board of Directors, do hereby certify that Kingdom Telephone Company's operating policies on "Customer Proprietary Network Information" are in compliance with the rules issued by the Federal Communication Commission on CPNI.

Furthermore, there have been no violations of these procedures.

Randall H. Boyd

Affiant

Subscribed and sworn to before me this 2nd day of February, 2006.

Paula Barnett

Notary Public

My Commission expires:

December 15, 2006

PAULA BARNETT
Notary Public - Notary Seal
STATE OF MISSOURI
AUDRAIN COUNTY
MY COMMISSION EXP. DEC. 15,2006

KINGDOM TELEPHONE COMPANY d/b/a KINGDOM LONG DISTANCE
Policy on Customer Proprietary Network Information (CPNI)
Written Policy Date: August, 2002 – Revisions May, 2004 – November 9, 2004

The explanation and policy below is meant to set rules for all employees of Kingdom Telephone Company d/b/a Kingdom Long Distance on the use of CPNI. There will be no use of CPNI for any marketing purposes by any employee(s) of the company without following the guidelines set forth below. Failure to follow these guidelines will result in disciplinary action taken against any violator of this policy.

APPLICABLE RULES – FCC Section 222(f) – MoPSC 4 CSR 240-33.160

According to FCC and MoPSC regulations, *"a telecommunications carrier may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the customer* ***does not already subscribe*** *to from that carrier, unless the carrier has customer approval to do so…"*

WHAT IS CPNI?

Regulations of the FCC & MoPSC state that CPNI means:

A. Information that relates to the quantity, technical configuration, type, destination and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier and that is made available to the carrier by the customer solely by the virtue of the carrier-customer relationship.
B. Information contained in the bills pertaining to telephone exchange or toll service received by a customer of a carrier; except that such term does not include subscriber list information.

In practical terms, CPNI is private information held only by Kingdom Long Distance through its business relationship with the customer that reveals:

A. Where, when and to whom they call
B. Amount and length of calls they make
C. Services they subscribe to (calling features, etc.)
D. Who their provider is for a given service

WHAT IS NOT CPNI?

A. Published directory information such as a customer's name, address, and telephone number
B. Information that is available in the public domain or from any other, non-company source
C. Information you gather from customers in ways other than through the provision of service
D. Information derived from sales of CPE or information services
E. Customer credit information
F. Products on bill that are not telecommunications services

OVERVIEW OF CPNI RULES

A. Kingdom Long Distance is permitted to use CPNI, ***without customer approval***, to market offerings that are related to, but limited by, the ***customer's existing service*** relationship. Those relationships would be:

- Telecommunications Services
  - Local Service
  - KLD
  - Inside Wiring
- Non-telecommunications Services
  - Information Services
  - Internet Access

Basically, you can use CPNI for the following without special customer permission.

- Non-marketing purposes including:
  - Initiation and billing of service
  - Protection against fraud
  - Network Planning
  - Normal customer service calls (billing, etc.)
- Marketing CPE and Information Services, except directed marketing of KTIS Internet for KTC customers
- Marketing inside wiring installation, maintenance and repair
- To win back customers who switched to another carrier from KTC/KLD
- Marketing of services within categories in which customer already is a subscriber

B. Before Kingdom Long Distance may use CPNI to market *outside the customer's existing service relationship*, we must give our customers' the opportunity to **opt-out** of having Kingdom market those services to them. *We have done the opt-out campaign during April 2003 via customer mass mailings and received oral orders from customers. New customers are advised of their privacy rights related to CPNI upon establishing service.* Active customers, choosing to opt-out of any CPNI marketing, have had their customer file updated to include a USOC establishing their account as a **"Restricted CPNI"** customer account.

For CPNI disclosure to unrelated third parties or to any Kingdom affiliate, a customer must "opt-in" to allow that information to be provided. **THIS WILL NOT BE DONE WITHOUT MANAGEMENT'S APPROVAL OF SUCH A DISCLOSURE.**

C. The FCC & MoPSC have implemented certain safeguards to protect CPNI from unauthorized distribution or access. Kingdom Long Distance is adopting these safeguards as a part of its CPNI policy.

- Approval Tracking

  Kingdom will retain customer's CPNI opt-out directives by posting those on the customer's account as "Restricted CPNI". All documents related to any marketing campaign using CPNI, will be filed in the CPNI Folder in the Administrative Assistant's file system for no less than one year.

- Employee Training

  All employees with access to customer records will know rules applying to CPNI

  - What is CPNI
  - When they can use CPNI and when they cannot use CPNI
  - Any violation of this policy will result in immediate termination

- Compliance Certificate

  - Annual, signed by corporate officer
  - Certification will include a statement that Kingdom's operating procedures are in compliance with the CPNI rules and include an accompanying statement that details how the carrier's procedures are not in compliance if applicable.
  - This certification will be available to public – Does not need to be filed w/FCC

- Supervisory Review

  All marketing campaigns using CPNI will be approved in advance by both the Marketing and Revenue Managers.

SUMMARY OF CPNI IMPACT

Impact on Marketing and Customer Service

Kingdom Long Distance will experience very little impact since we have no plans to use CPNI in our marketing efforts. We will continue to market/advertise to **all** versus only select, targeted customers.

We would be in violation of CPNI rules if we began a new "out of category" services marketing campaign that used best/most logical customer targeting strategies. For example, we could not target MCI WorldCom customers without our joint customer's prior knowledge of CPNI rules and the opportunity to opt-out.

One-time use approvals

On an inbound or normal course of business outbound call, you can look at CPNI and market new services to a customer *if you receive oral approval to do so before marketing the service and their file does not indicate "Restricted CPNI"*.

If we were to do a targeted telephone marketing campaign, our responsibility as part of the approval process should be:

- Must state that the customer has a right, and that Kingdom has a duty, under federal law, to protect the confidentiality of their CPNI. (NOTE: If they want to restrict CPNI, we must do that immediately without further marketing discussions)
- Must specify the types of information that constitute CPNI
- Must describe the purposes for which CPNI will be used
- Must state the approval is for the length of the call only
- Must be clear to the customer and not misleading

The call may state that use of CPNI will enhance Kingdom's ability to offer products and services tailored to the customer's needs.