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FEB 6 2006  
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### Statement of Explanation: CPNI Compliance

This accompanying statement explains how LVT Corp'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.

LVT Corp 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;
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules; and
- the establishment of a procedure to notify the Commission of any instance where the opt-out mechanism did not work properly.



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**Certificate of Compliance: Customer Proprietary Network Information (CPNI)**

This certifies that the undersigned, as a corporate officer of LVT Corp, has personal knowledge that LVT Corp 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.

Signature: \_\_\_\_\_

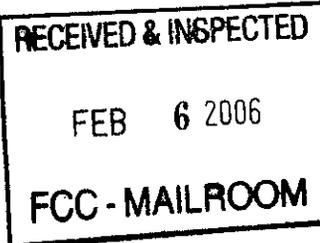
Title: President

Date: July 14, 2005



**SANTEL** COMMUNICATIONS  
COOPERATIVE, INC.

*"Bringing the World Together"*



February 3, 2006

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

RE: EB-06-TC-060

Dear Ms. Dortch:

Enclosed is the original and four copies of the Certification of CPNI Filing dated January 31, 2006, for Santel Communications.

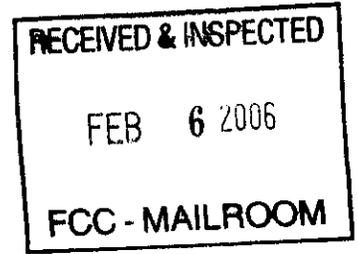
Sincerely,

Gene Kroell  
General Manager

Attachment

cc: Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554  
e-mail: [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)

Best Copy and Printing, Inc. (BCPI)  
Portals II  
445 12<sup>th</sup> Street, S.W., Room CY-B402  
Washington, D.C. 20554  
e-mail: [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)



**Certification of Customer Proprietary Network Information (CPNI) Filing  
Dated: January 31, 2006**

**Reference: EB-06-TC-060**

**for**

**Santel Communications Cooperative  
PO Box 67  
Woonsocket SD 57385-0067**

I, , hereby certify that I have personal knowledge that Santel Communications has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. (See attachment)

Signed: Gene Kroell

Printed Name: Gene Kroell

Title: General Manager

Date: 2-9-06

Attachment

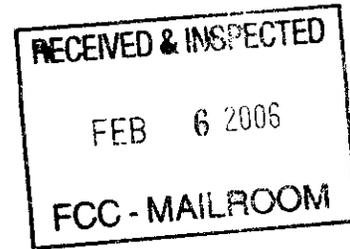
**Customer Proprietary Network Information (CPNI)  
Documentation  
for  
Santel Communications Cooperative  
PO Box 67  
Woonsocket SD 57385-0067**

- CPNI rules are reviewed on a regular basis with employees that have access to CPNI.
- Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
- A process that meets the notice requirements of the rules has been developed for notifying customers of their CPNI rights and requesting approval to use CPNI via the opt-out method.
- Company provides CPNI notification to customers every two years.
- Customer account records show the approval/denial status for the account.
- Company retains CPNI notification and approval records for two years.
- Company maintains a record of any marketing campaigns of its own or its affiliates that use customers' CPNI. These records are maintained for a minimum of one year.
- An outbound marketing supervisory review process has been established.
- Company will not provide CPNI to third parties without the customer's approval via the opt-in process.
- Company has a defined disciplinary process in place for violations and for improper use of any information in customer records which would include CPNI.



**National Network Communications, Inc.**

9750 US 70 East  
Post Office Box 59  
Princeton, NC 27569



February 2, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

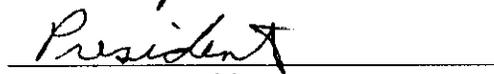
Re: Certification of CPNI Filing  
EB-06-TC-060  
EB Docket no. 06-36

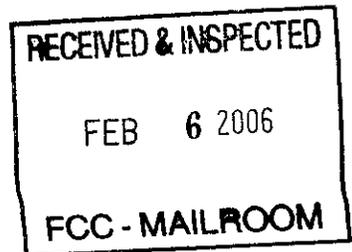
Dear Ms. Dortch:

National Network Communications, Inc. is filing herewith, in accord with the Commission's Public Notice (DA 06-223 Released January 30, 2006) and 47 C.F.R. Section 64.2009(e), its Certification of Compliance and an accompanying statement for the year ended December 31, 2005.

Thank you for your attention to this matter.

Very truly yours,

  
Stanley C. Chestnut  
  
President  
Title



STATEMENT CONCERNING OPERATING PROCEDURES

National Network Communications, Inc. (Carrier) has established procedures for its operations which ensure compliance with the rules of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI).

Carrier employs a system by means of which Carrier can establish the status of each customer's CPNI approval before Carrier uses that CPNI. Carrier trains its employees in the authorized use of CPNI and has established procedures for the disciplining of any employee which does not adhere to Carrier's CPNI safeguard procedures.

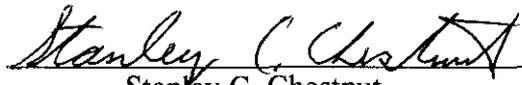
Carrier retains a record of the sales and marketing campaigns of itself and its affiliates which use the CPNI of its customers. Carrier retains a record of each instance in which CPNI was disclosed or provided to third parties, or where third parties were provided with access to CPNI. Carrier's records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign.

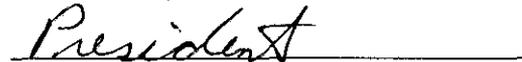
Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for outbound marketing situations and Carrier maintains a record of Carrier's compliance for a minimum of one year. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request.

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FEB 6 2006  
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CERTIFICATION

I, Stanley C. Chestnut, hereby certify this 2<sup>nd</sup> of February, 2006, that I am an officer of National Network Communications, Inc. and that I have personal knowledge that National Network Communications, Inc. has established operating procedures that are adequate to assure compliance with the rules codified at 47 C.F.R. Sections 64.2001-2009 which regulate Customer Proprietary Network Information.

  
Stanley C. Chestnut

  
Title



Tel: 213.996.1998  
Fax: 213.452.7053  
615 S. Grand Ave. Los Angeles, CA 90017

RECEIVED & INSPECTED

FEB 6 2006

FCC - MAILROOM

**Annual Officer's Certificate of Customer Proprietary Network Information Compliance**

**Marlene H. Dortch**  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: **Certification of CPNI COMPLIANCE**  
**Filing February 6, 2006**  
**EB-06-TC-060**

Dear **Ms. Dortch**:

I am a corporate officer of Vertex SSX Corporation and as such do hereby certify, affirm, depose, and say that I have authority to make this Annual Officer's Certification of Customer Proprietary Network Information ("CPNI") Statement of Compliance on behalf of Vertex SSX Corporation. I have personal knowledge that Vertex SSX Corporation has established adequate operating procedures to ensure compliance with section 64.2009(e) of the FCC's rules as follows:

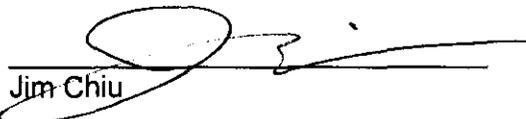
Vertex SSX Corporation will not permit the use or disclosure of CPNI outside the existing service relationship without customer approval. Further, Vertex SSX Corporation will not disclose or provide data brokers with access to CPNI. In instances where joint venture partners, or independent contractors, have access to CPNI, the parties have executed a confidentiality agreement insuring the ongoing confidentiality of the CPNI.

This certification is effective from January 1, 2005 to December 31, 2005.

This certification is dated this 2nd day of February 2006.

Very Truly Yours,

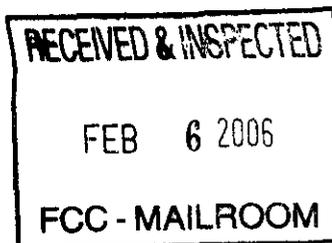
Vertex SSX Corporation

  
Jim Chiu

cc Byron McCoy, Telecommunications Consumers Division, FCC  
Patrick D. Crocker, Early, Lennon, Crocker & Bartosiewicz, P.L.C.  
Best Copy and Printing, Inc.



Tel: 213.996.1998  
Fax: 213.452.7053  
615 S. Grand Ave. Los Angeles, CA 90017



**Annual Officer's Certificate of Customer Proprietary Network Information Compliance**

**Marlene H. Dortch**  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: **Certification of CPNI COMPLIANCE**  
**Filing February 6, 2006**  
**EB-06-TC-060**

Dear **Ms. Dortch**:

I am a corporate officer of Vertex SSX Corporation and as such do hereby certify, affirm, depose, and say that I have authority to make this Annual Officer's Certification of Customer Proprietary Network Information ("CPNI") Statement of Compliance on behalf of Vertex SSX Corporation. I have personal knowledge that Vertex SSX Corporation has established adequate operating procedures to ensure compliance with section 64.2009(e) of the FCC's rules as follows:

Vertex SSX Corporation will not permit the use or disclosure of CPNI outside the existing service relationship without customer approval. Further, Vertex SSX Corporation will not disclose or provide data brokers with access to CPNI. In instances where joint venture partners, or independent contractors, have access to CPNI, the parties have executed a confidentiality agreement insuring the ongoing confidentiality of the CPNI.

This certification is effective from January 1, 2005 to December 31, 2005.

This certification is dated this 2nd day of February 2006.

Very Truly Yours,

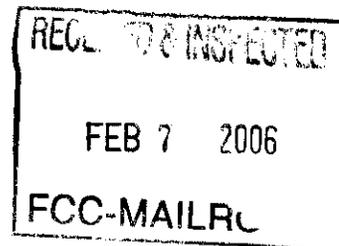
Vertex SSX Corporation

  
Jim Chiu

cc Byron McCoy, Telecommunications Consumers Division, FCC  
Patrick D. Crocker, Early, Lennon, Crocker & Bartosiewicz, P.L.C.  
Best Copy and Printing, Inc.



1575-50<sup>th</sup> Street  
Brooklyn New York 11219  
718-854-3600  
718-435-1514



**CERTIFICATION OF CPNI FILING - February 3, 2006**  
WC Docket No. 05-196  
Reference: EB-06-TC-060

I, Abe Leibler, of Tristate Bell Inc. d/b/a Connect Tel do hereby certify that Tristate Bell Inc.. d/b/a Connect-Tel is fully compliant with the FCC's CPNI rules 47 CFR Section 64.2009 and EB-06-TC-060. I have personal knowledge that the procedures we have adopted are adequate to ensure compliance with the FCC rules. To market service outside the customer's existing service relationship, we obtain customer approval by using the "Opt-Out" Method. Our operating procedures follow the rules for the "Opt-Out" Method. The customer notification provides sufficient information to enable the customer to make an informed decision.

A handwritten signature in black ink, appearing to read "A. Leibler", written over a horizontal line.

Name: Abe Leibler  
Title: CEO

Date: 2/3/06

## STATEMENT

The operating procedures of the Company are designed to ensure compliance with the CPNI rules applicable to them. Such procedures are as follows.

### CPNI Use

(1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.

(2) We use, disclose or permit access to CPNI to provide or market service offerings among the categories of service – local and interexchange -- to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we do not share the customer's CPNI with an affiliate without the Customer's approval.

(3) We use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval.

(4) Without Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

(5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

## **CPNI Approvals**

(1) When Customer approval to use, disclose or permit access to Customer CPNI is required, we obtain approval through written, oral or electronic methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We maintain all records of Customer approvals for at least one year.

(2) Subject to "opt-out" approval requirements, we use a Customer's individually identifiable CPNI to market communications-related services to that Customer, and we disclose that CPNI to our affiliates that provide communications-related services. We also allow these to obtain access to such CPNI to market communications-related services.

### **CPNI Notice Requirements**

(1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI either before or along with a solicitation of approval, and we maintain records of notification, whether oral, written or electronic, for at least one year. We solicit Customer approvals proximate to when we notify them of their CPNI rights.

(2) Our notifications provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we indicate that any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.

(3) We advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes. However, we may provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

(4) Our notifications are comprehensible and not misleading and, if written, are legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of a notification is in another language, all portions of the notification will be in that language.

(5) We do not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.

(6) For “opt-out” approvals, our notifications satisfy (1) – (5). We do not use oral notifications except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether we use “opt-out” or “opt-in” approval based on the nature of the contact. When we use oral notice in this manner, we comply with (1) – (5), except that, if none of the following situations are relevant to the limited use for which we seek CPNI, we will not: (a) advise Customers, if they have opted out previously, that no action is needed to maintain the “opt-out” election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party; (c) disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to one-time use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.

(7) In addition, for “opt-out” approvals, we wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and notify Customers of the applicable waiting period for a response before approval is assumed. For electronic notifications, we recognize that the waiting period begins to run on the date the notification is sent and, for mail notifications, it begins to run on the third day following the date the notification was mailed. For e-mail opt-out notices, in addition to other requirements, we: (a) obtain express, verifiable, prior approval to send notices by e-mail regarding their service in general or their CPNI in particular; (b) allow Customers to reply directly to e-mails in order to opt-out; (c) use another means of communicating the notice if the e-mail is returned as undeliverable before considering the Customer to have received notice; and (d) ensure that the subject line in the e-mail clearly and accurately identifies the subject matter of the e-mail.

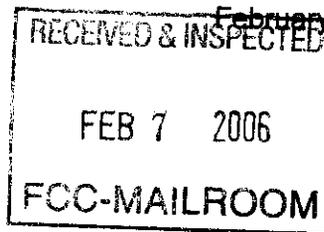
(8) In addition, for “opt-out” approvals, we provide notices to our customers every two years, and we make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

### **CPNI Safeguards**

- (1) We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place.
- (3) We maintain a record of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI, and we maintain a record of all instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We retain these records for at least one year.
- (4) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and we maintain compliance records for at least one year. Specifically, our sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.
- (5) We have a corporate officer who acts as agent for the Company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. We provide a Statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.
- (6) We provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. That notice is in the form of a letter and includes the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether relevant state commission(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. We submit the notice even if other methods by which consumers may opt-out are offered.



Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D. C. 20554



Re: EB-06-TC-060, Certification of CPNI Filing, February 3, 2006  
ComScape Telecommunications, Inc.

Dear Ms. Dortch:

The undersigned, being an officer of ComScape Telecommunications, Inc. ("Company"), does hereby certify that the Company is in compliance with respect to the handling of Customer Proprietary Network Information. Four copies of this certification are enclosed.

We have instituted the following safeguards to protect the customer information:

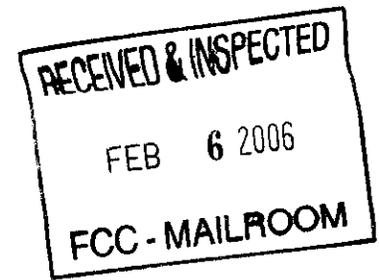
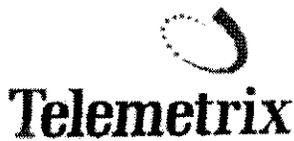
1. **Systems Built-in Safeguards**
  - Customer information including the call records are accessible only by authorized personnel with special pass codes.
  - The records are retrieved, if required by law enforcement agencies, only after verifying proper court subpoenas/orders. Also, only authorized Company personnel handle such requests.
2. **Management Safeguards**
  - Regular personnel training and reinforcement of the process and need to protect the customer proprietary information.
  - Proper documentation and follow through
3. We have not undertaken any Tele-marketing programs. In the future, if we undertake Tele-marketing, we will assure that proper safeguards are adhered to by the Company as well as by a third party, if any.

Additionally, a senior management person oversees the handling of the customer proprietary information. I hope the above meets the FCC requirements. Please let us know if additional information is required.

Thank you.

Sincerely,

*Bhogilal M. Modi*  
Bhogilal M. Modi  
Vice President



February 3, 2006

Enforcement Bureau  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: EB-06-TC-060,  
Certification of CPNI Filing on February 3, 2006,

To Whom It May Concern:

This certification is sent pursuant to DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's rules in connection with Customer Proprietary Network Information ("CPNI"). During the year of 2005, I have had personal knowledge that this company had procedures in place that are adequate to ensure compliance with the CPNI rules under Subpart U in Part 64 of the Commission's rules and regulations.

If there are any questions in connection with this letter, please contact this office.

Respectfully submitted,

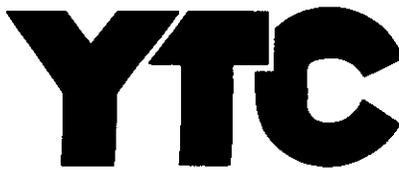
A handwritten signature in black ink, appearing to read "Larry Becker".

Larry Becker  
Authorized Representative

Enclosure

cc: Byron McCoy, byron.mccoy@fcc.gov  
Best Copy and Printing, fcc@bcpiweb.com

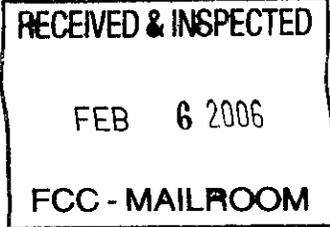
Telemetrix Inc.  
7105 La Vista Place, Suite 100  
Longmont, CO 80503  
(303) 652-3279



**YELCOT TELEPHONE COMPANY**

P.O. Box 1970 • Mountain Home, AR 72654-1970

February 2, 2006



**VIA COURIER**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Yelcot Telephone Company, Inc.  
499 Filer ID: 801189  
FRN: 0001-7312-80  
Certification of CPNI Procedures and  
Statement of Compliance Concerning CPNI Rules  
**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) and 47 C.F.R. § 64.2009(e) the undersigned, an officer of Yelcot Telephone Company, Inc. (hereinafter the "Company") certifies that 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,

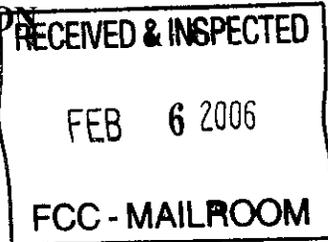
Lang Zimmerman  
Vice President

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

207 E. 4th Street • Mountain Home, AR 72653

Phone 870-425-3100 • Fax 870-435-8250

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



Yelcot Telephone Company, Inc.  
(Company Name)

499 Filer ID: 801189

FRN: 0001-7312-80

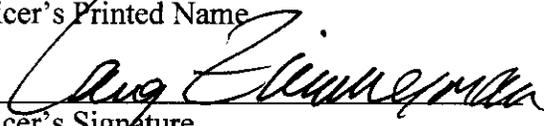
In response to EB-06-TC-060

CERTIFICATION OF CPNI PROCEDURES  
FEBRUARY 6, 2006

On behalf of Yelcot Telephone Company, Inc. (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.

Lang Zimmerman  
Officer's Printed Name

  
Officer's Signature

Vice President  
Title

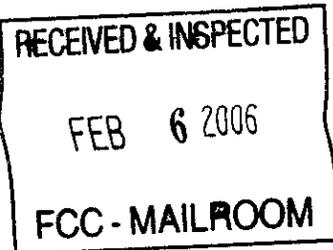
February 2, 2006  
Date

**Yelcot Telephone Company, Inc.**

(Company Name)

499 Filer ID: 801189

FRN: 0001-7312-80



**In response to EB-06-TC-060**

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

Yelcot Telephone Company, Inc. (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.

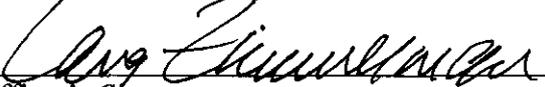
Customer notification and approval methods if CPNI is ever used by the Company through customer approval is as set forth below:

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.

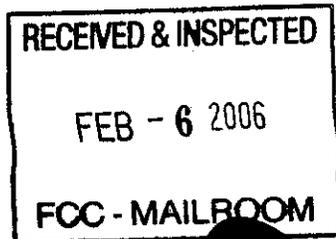
If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

Lang Zimmerman  
Officer's Printed Name

  
Officer's Signature

Vice President  
Title

February 2, 2006  
Date



*Brooklyn Mutual*  
*Telecommunications Cooperative*  
129 Jackson St., P.O. Box 513 Brooklyn, IA 52211-0513  
Phone: 641-522-9211 Fax: 641-522-5001

February 2, 2006

Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060 & EB-06-36, Certification of CPNI Filing 2005**

Dear Ms. Dortch:

Our Wireline and Wireless Operations are under the same company name, Brooklyn Mutual Telecommunications Cooperative. We hope that the one filing will be sufficient for both.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Atkinson". The signature is written in a cursive, flowing style.

Tim Atkinson  
General Manager  
Brooklyn Mutual Telecommunications Cooperative

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Room CY-B402,  
Washington, DC 20554



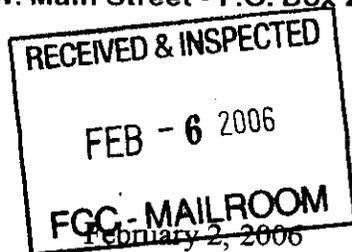
*Brooklyn Mutual  
Telecommunications Cooperative*  
129 Jackson St., P.O. Box 513 Brooklyn, IA 52211-0513  
Phone: 641-522-9211 Fax: 641-522-5001

Brooklyn Mutual Telecommunications Cooperative  
Certification of CPNI Filing  
February 2, 2006

1. Company does not use CPNI for marketing purposes.
2. Company personnel are trained as to what information is classified as CPNI and do not use CPNI for Marketing Purposes.
3. The Company has implemented appropriate safeguard policies for CPNI and has documented them in the Company's procedures for training personnel.
4. The Company is submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on February 2, 2006 in DA 06-258, pursuant to Section 64.2009(e) of FCC rules

# **STC** Sharon Telephone Company, Inc.

303 W. Main Street • P.O. Box 280 • Hills, Iowa 52235-0280 • Phone (319) 679-2211 • FAX (319) 679-2200



Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060, Certification of CPNI Filing 2005**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2005", as ordered in EB-06-TC-060.

Our Company has established operating procedures that are adequate to ensure its compliance with the rules in Title 47 – Telecommunications, Section 64.2009. Furthermore I am certifying that I have personal knowledge of these procedures and they are in fact ensuring that our Company is in compliance with the rules in Title 47 – Telecommunications, Section 64.2009.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Michael A. Yoder".

Michael A. Yoder  
General Manager  
Sharon Telephone Company

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,  
Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington,  
DC 20554

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC 20554



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RECEIVED & INSPECTED  
FEB - 6 2006  
FCC - MAILROOM

February 2, 2006

Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
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445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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If you have any questions, please feel free to contact me.

Sincerely,

Michael A. Yoder  
General Manager  
Sharon Telephone Company

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,  
Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington,  
DC 20554

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