



2006

February 1, 2006

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 (February 1, 2006)

Dear Ms. Dortch:

As required in the Public Notice released on January 30, 2006 (DA 06-223), enclosed is the original and four copies of **AMHERST TELEPHONE COMPANY'S** most recent CPNI Compliance Certification and the accompanying statement explaining how our operating procedures ensure compliance with the rules.

If you have any questions or need any additional information, please contact me.

Sincerely,

Carl F. Bohman  
President & General Mgr.

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. (BCPI)  
Portals II  
445 12<sup>th</sup> Street SW  
Room CY-B402  
Washington, DC 20554

Interstate Telcom Consulting, Inc.



### **Statement of Explanation: CPNI Compliance**

This accompanying statement explains how **Amherst Telephone Company'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.

**Amherst Telephone Company** 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.



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

This certifies that the undersigned, as a corporate officer of Amherst Telephone Company, has personal knowledge that Amherst Telephone Company, 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: Carl F. Bohman

Carl F. Bohman

Title: President & General Mgr.

Date: December 28, 2005