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September 27, 2006

**Via ECFS**

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

**Re: Silver Star Communications  
Certification of CPNI Filing February 3, 2006  
EB Docket No. 06-36, EB-06-TC-060**

Dear Ms. Dortch:

Silver Star Telephone Company, Inc. d/b/a Silver Star Communications (“SSTC”), by its attorneys, hereby amends the above-referenced certification filed by Silver Star Communications on February 3, 2006 pursuant to the Federal Communications Commission’s (“FCC”) *Public Notice* dated February 2, 2006 (DA 06-258) to clarify the entities to which it applies. In that certification, Ron B. McCue, an officer of SSTC, certified to his personal knowledge that Silver Star Communications had established operating procedures regarding the Customer Proprietary Network Information generated by the Customers of Silver Star Communications. In the attached Declaration and newly submitted certification, Mr. McCue clarifies that the originally executed certification submitted on February 3 was intended to apply to both SSTC and its wholly owned subsidiary, Gold Star Communications d/b/a Silver Star PCS. Accordingly, SSTC respectfully requests that this filing be treated as an amendment to the February 3 certification, a copy of which is attached hereto, and associated therewith.

If you need further information, please contact the undersigned.

Sincerely,

/s/

Michael R. Bennet

Enclosures

cc: Byron McCoy (via email, [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov))  
FCC Copy Contractor (via email, [fcc@bpciweb.com](mailto:fcc@bpciweb.com))

**DECLARATION OF RON B. McCUE**

I, Ron B. McCue, do hereby declare under penalty of perjury the following:

1. I am an officer of Silver Star Telephone Company d/b/a Silver Star Communications ("SSTC") and its wholly owned subsidiary, Gold Star Communications d/b/a Silver Star PCS ("Silver Star PCS").
2. On February 3, I submitted a certification regarding the Customer Proprietary Network Information procedures of Silver Star Communications. Although Silver Star PCS was not explicitly named in that certification, my intent at that time was that the certification on behalf of Silver Star Communications cover both SSTC and Silver Star PCS.

  
Ron B. McCue

9-19-06  
Date

**CPNI Corporate Certification**

**Required Annually**

I, Ron B. McCue, am an officer of Silver Star Telephone Company, Inc. d/b/a Silver Star Communications ("SSTC") and its wholly owned subsidiary, Gold Star Communications d/b/a Silver Star PCS ("Silver Star PCS") (referred to collectively hereinafter as "Silver Star Communications"). Pursuant to FCC Rule Section 64.2009(e), I hereby certify that I have personal knowledge that SSTC and Silver Star PCS have established operating procedures that are adequate to ensure compliance with the FCC's CPNI Rules. Silver Star Communications' procedures regarding the Customer Proprietary Network Information generated by its customers are described in the attached pages. These pages explain how Silver Star Communications' operating procedures ensure compliance with the FCC's CPNI rules contained in Part 64, Subpart U.

  
Signed \_\_\_\_\_

Dated: 9-19-06



## Certification of CPNI Filing

February 3, 2006

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

Re: EB-06-TC-060

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 30, 2006, *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, (DA-06-223).

As directed, a copy of this report has been sent to Bryon McCoy of the Commission's Enforcement Bureau, Telecommunications Consumers Division.

All inquiries in connection with this filing should be addressed to our office.

Respectfully submitted,

A handwritten signature in blue ink that reads "Ron B. McCue".

Ron B. McCue  
Vice President  
Silver Star Communications

Enclosures

cc: Bryon McCoy, Telecommunications Consumers Division

Post Office Box 226  
104101 Highway 89  
Freedom, Wyoming 83120  
Phone 307-883-2411, FAX 307-883-2575

**ANNUAL CERTIFICATION – Customer Proprietary Network Information  
Procedures of Silver Star Communications**

I, Ron B. McCue hereby certify that I have personal knowledge that Silver Star Communications has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Silver Star. These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Signed: 

Ron B. McCue, Vice President

Feb. 03, 2006

**Certification of CPNI Filing**  
**Feb. 03, 2006**  
**Silver Star Communications**

Silver Star Communications hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Silver Star Communications takes its statutory responsibility to protect its customers' CPNI seriously and therefore does not sell, rent or otherwise disclose customers' CPNI to other entities. Further, Silver Star Communications does not currently use, nor allow its affiliates to use, any customers' CPNI in marketing activities. Any request for CPNI is immediately forwarded to Ron B. McCue, the Vice President of Silver Star Communications. Silver Star Communications employees have been educated about CPNI, federal regulations and Silver Star Communications statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal. Further, does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.

**Certification of CPNI Filing**  
**Feb. 03, 2006**  
**Silver Star Communications**

Silver Star Communications hereby submits that its procedures regarding its customers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2009.

Silver Star Communications uses its customers' CPNI in compliance with the Commission's rules in 47 CFR §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, dependent on use, given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage. Further, on all in-bound calls, customers are given notice that their CPNI may be used and given the opportunity to allow or disallow CPNI usage for the duration of that call.

Silver Star Communications employees, including marketing and sales personnel and customer service representatives, have been educated about CPNI, federal regulations and Silver Star Communications statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Employees may easily determine the CPNI status of individual customers prior to using CPNI. Silver Star Communications maintains a written log regarding outbound usage of CPNI including a description of the marketing activity, which products and/or services were marketed and the specific CPNI used. All sales and marketing personnel obtain approval from his/her supervisor of any outbound usage of CPNI. Silver Star Communications currently does not sell, rent or otherwise disclose customers' CPNI to non-affiliated entities. If Silver Star Communications affiliates are allowed to access customers' CPNI, then such disclosure is noted in the written log.

In compliance with the Commission's rules, Silver Star Communications does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.