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January 28, 2008

Via ECFS

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

Re: CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

Comanche County Telecommunications, LP dba Comanche County Long Distance, by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Gregory W. Whiteaker

Attachments

Certification of CPNI Compliance

My name is Toney Prather, and I am the President of Comanche County Telecommunications, LP dba Comanche County Long Distance ("the Company") of P.O. Box 290, De Leon, Texas 76444. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") customer proprietary network information ("CPNI") rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations, Sections 64.2001 through 64.2011.

This certification is made pursuant to the requirements of the Federal Communications Commission ("FCC") under Section 64.2009(e) of the FCC rules. The purpose of this certification is to verify this company's compliance with FCC requirements regarding the company's maintenance, use, and protection of customer proprietary network information ("CPNI").

A handwritten signature in black ink, appearing to read "Toney Prather", written over a horizontal line. The signature is cursive and stylized.

Signature

Toney Prather
President, Comanche County Telecommunications, LP dba
Comanche County Long Distance

January 15, 2008

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

To the best of my knowledge, Comanche County Telecommunications, LP dba Comanche County Long Distance ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because 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 §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with 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 has not taken any actions against data brokers in the past year concerning the unauthorized release of CPNI. The Company has received zero (0) customer complaints relating to the unauthorized access to CPNI, or unauthorized disclosure of CPNI. The Company realizes the industry-wide pretexting problem, and has implemented several safeguard procedures to protect its customers CPNI such as password protection and authorized user lists, to name a few.

Company CPNI Status: To the best of my knowledge and belief, the Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.