



there's more in the mix

February 7, 2008

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

Re: Annual 64.2009(e) CPNI Certification or 2008
Form 499 Filer ID: 822884
EB Docket No. 06-36

Dear Ms. Dortch:

This statement is to certify that Keystone Wireless, LLC ("Keystone") has not and does not sell any customer information to anyone or to any company. Keystone keeps all customer information and records, both paper and electronic, in a secure location. Access to this location and the information stored there is strictly limited to a few authorized personnel of Keystone, each of whom has been trained in the need to maintain the strictest security respecting customer proprietary information.

Keystone has trained all personnel to maintain customer records as proprietary information and to not share such information with any outside parties. Attached to this certificate is a copy of Keystone's written policy regarding the procedures to be employed for the protection of customer information. Keystone has distributed a copy of this written policy to all personnel.

Keystone did not take any actions against data brokers in the past year. Also, Keystone did not receive any customer complaints in the past year concerning the unauthorized release of CPNI.

I, the undersigned, hereby certify under penalty of perjury that I am an officer of Keystone and am responsible for the preparation of this certificate. I further certify to the truth and accuracy of the information contained in this certificate, that I have personal knowledge of Keystone's operating procedures as set forth in the first two paragraphs of this letter, and that those operating procedures are adequate to ensure compliance with the FCC's CPNI rules set forth in §§64.2001 *et seq.*

A handwritten signature in black ink, appearing to read "Robert C Martin", is written over a light-colored, textured background.

Robert C Martin
President

cc: Enforcement Bureau, FCC (2 copies)
Best Copy and Printing, Inc. (1 copy)

CUSTOMER INFORMATION POLICY

To protect the proprietary and private information about our customers, Keystone Wireless, LLC, has established this company policy regarding customer information:

1. All of the company's proprietary data bases, including that containing customer information, are password protected, and access to same is limited to authorized personnel only. Distribution of the password is limited to those authorized personnel. The password will be changed routinely, and whenever an employee with access to such data bases leaves the company.
2. No customer information in any form is to be removed from the company's offices by employees or others. This includes computer printouts, handwritten information or notes, copies of files or documents in any electronic form, and verbal transmission of customer information to persons who are not direct employees of the company.
3. Employees are to closely guard customer lists, contact information, telephone numbers, mobile code lists and all other customer information, both proprietary and public, to prevent any information from being removed from our offices by non-employees either accidentally or intentionally.
4. The notes a salesperson may make about a customer, number of mobiles in use and mobile numbers to assist in a sale must be returned to the company's office and re-filed or shredded. If, for example, a salesperson is making a sales call to Customer A to discuss adding more mobiles for Customer A, the salesperson may need to take information on the number of mobile units already in service at Customer A. This information is to be shared only with the customer who is using those mobile units. At the completion of the sales call, the information is to be returned to the office and re-filed or shredded.
5. Internal documents, notes made when customers call in, and anything containing customer names and telephone numbers must be shredded at the end of the business day.
6. Each new customer is asked to select a personal password and provide the company with certain information that only the customer knows, such as a mother's maiden name, city of birth, a favorite pet's name, etc., which password and information is to be used for identification purposes. Upon contact with a customer, you must request that the customer confirm his/her identity by providing you with his/her pre-existing password and pre-selected information before discussing any matter with the customer. If the customer chooses to not use a password, they must verify their SS# and current billing address before information is given to them regarding their account.
7. Customer information is never to be used or disclosed to anyone, except as follows:
 - (a) to market the company's service offerings to which the customer already subscribes;
 - (b) to market the company's CPE, information services, and adjunct-to-basic services;
 - (c) for purposes of conducting health effects research;

- (d) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
 - (e) to disclose all location information in emergency situations, as provided for under §§222(d)(4) & (f) of the Communications Act of 1934, as amended;
 - (f) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
 - (g) to resolve specific customer questions about the customer's own account, arising in the course of a telephone conversation between that customer and company's service representative, and then only after orally obtaining from the customer a limited, one-time authorization to use the customer's information for the duration of that phone call.
8. Disconnected or inactive customer files are to be retained for no more than 3 years, and then shredded. Disconnected or inactive customer files are never to be placed in the trash unshredded. Customer database printouts are to be shredded when replaced by newer printouts.
9. Appropriate disciplinary action will be taken for any violations of this policy.