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February 19, 2008

VIA ECFS

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

Re: Annual Customer Proprietary Network Information Compliance Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Please find the attached Annual Customer Proprietary Network Information ('CPNI') Compliance Certification for Newroads Telecom. Please feel free to call me if you have any questions regarding this filing.

Sincerely,

Devin L. Crock

Attachment

DC01/CROCDE/327375.1

Annual Customer Proprietary Network Information Certification
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36
February 19, 2008

Vantage Telecom, LLC d/b/a Newroads Telecom
Form 499 Filer ID: 821668
Name of Signatory: William T. Stuckey
President, Vantage Telecom, LLC

I, William T. Stuckey, certify that I am an officer of Vantage Telecom, LLC d/b/a Newroads Telecom ("Newroads"), and acting as an agent of Newroads, that I have personal knowledge that Newroads has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Newroads' procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

Newroads has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. Newroads has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.,* through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

Newroads has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

William T. Stuckey

William T. Stuckey
President
Vantage Telecom, LLC d/b/a Newroads Telecom

Date: 2/18/2007

Customer Proprietary Network Information Certification
Attachment A

Newroads has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

Safeguarding against pretexting

- Newroads takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Newroads is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- Newroads trains its supervisory and non-supervisory personnel upon employment and then periodically as needed in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is, (b) join in and carry-out Newroads' obligation to protect CPNI, (c) understand when they are and when they are not authorized to use or disclose CPNI, and (d) keep records regarding customer complaints regarding CPNI.

- Newroads employees are required to review Newroads' CPNI practices and procedures set forth in training materials, CPNI policy, and other methods Newroads uses to memorialize its CPNI policies and to acknowledge their comprehension thereof.

- Newroads also requires any outside Dealers and Agents that have access to CPNI to review Newroads' CPNI practices and procedures and to acknowledge receipt and review thereof.

- Newroads has an express disciplinary process in place for violation of the Newroads' CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

Newroads' use of CPNI

- Newroads makes available on its website, www.newroadstelecom.com, a policy statement about its use of CPNI.

- Newroads uses CPNI for the following purposes:

  - To initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
  - To comply with applicable law.

- Newroads does not disclose or permit access to CPNI to track customers that call competing service providers.

- Newroads discloses and permits access to CPNI where required by law (*e.g.,* under a lawfully issued subpoena).

Customer approval and informed consent

- Newroads has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for any purpose. This system also allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

  - Prior to any solicitation for customer approval, Newroads notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI.
  - Newroads uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or in 47 USC 222 and the FCC's CPNI rules.
  - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
  - Records of approvals are maintained for at least one year.
  - Newroads provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
  - The content of Newroads' CPNI notices comply with FCC rule 64.2008(c).

  Opt-out

  - When Newroads uses opt-out approval, Newroads provides notification by electronic or written methods and waits 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. Newroads provides customers with opt-out notifications every two years. When using e-mail for opt-out notices, Newroads complies with the additional requirements set forth in FCC rule 64.2008(d)(3). Additionally, Newroads makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, seven days a week.

  One time use

  - After authentication, Newroads uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with FCC rule 64.2008(f).

Additional safeguards

- Newroads does not use CPNI for marketing purposes and therefore has no records to maintain regarding marketing campaigns that use its customers' CPNI.

- Newroads has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- Newroads designates one or more officers, as an agent or agents of the Newroads, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).

- Newroads will provide written notice to the Commission in accordance with the requirements of FCC rule 64.2009(f) if ever its opt-out mechanisms malfunction in the manner described therein.

- For customer-initiated telephone inquiries regarding or requiring access to CPNI, Newroads authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then Newroads only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.

- For online customer access to CPNI, Newroads authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, Newroads utilizes a customer-established password to authorize account access. Newroads establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of FCC rule 64.2010(e).

- Newroads discloses CPNI to customers at Newroads' retail location if the customer first presents a valid photo ID matching the customer's account information.

- Newroads notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

- Newroads may negotiate alternative authentication procedures for services that Newroads provides to business customers that have both a dedicated account representative and a contract that specifically addresses Newroads' protection of CPNI.

- In the event of a breach of CPNI, Newroads has practices and procedures in place to notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs Newroads to delay notification, or Newroads and the investigatory party agree to an earlier notification. Newroads will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.

- Newroads does not disclose or provide access to CPNI to independent contractors or joint venture partners.