

Law Offices of Gregory J. Vogt, PLLC

2121 EISENHOWER AVENUE
SUITE 200
ALEXANDRIA, VA 22314

www.vogtlawfirm.com

Gregory J. Vogt
703.838.0115 (office)
703.684.3620 (fax)
gvogt@vogtlawfirm.com

February 19, 2008

Enforcement Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Customer Proprietary Network Information Certification for 2007 for
North Pittsburgh Telephone Co., FCC 499-A ID No. 802458; EB Docket
No. 06-36

Dear Ms. Dortch:

Please find attached the annual certification of North Pittsburgh Telephone Co. containing the information required in 47 C.F.R. § 64.2009(e). Please let me know whether you have any questions.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for North Pittsburgh Telephone Co.

Enclosure

**NORTH PITTSBURGH TELEPHONE COMPANY
ANNUAL CPNI COMPLIANCE CERTIFICATION
at 47 C.F.R. § 64.2009(e)**

I, Kevin J. Albaugh, Vice President-Regulatory Affairs of North Pittsburgh Telephone Company ("Company"), do hereby declare under penalties of perjury and in accordance with 47 C.F.R. § 64.2009(e) that for the year 2007, based upon my personal review, the Company has established operating procedures that are adequate to ensure that the Company is in compliance with the FCC Rules as set forth at 47 C.F.R. Part 64, Subpart U. Attached to this certification of compliance is an accompanying statement that explains how the Company's operating procedures ensure that the Company is in compliance with the applicable rules. I declare under penalty of perjury that the foregoing, as well as the enclosed Accompanying Statements and Summary of Customer Complaints, are true and correct to the best of my knowledge and belief.



Signature

12-31-07

Date

Exhibit A

**ACCOMPANYING STATEMENT
OF
NORTH PITTSBURGH TELEPHONE COMPANY
REGARDING
COMPLIANCE WITH CPNI REGULATIONS FOR 2007
AT
47 C.F.R. § 64.2009**

In order to comply with the FCC rules set forth at 47 C.F.R. Part 64, Subpart U, North Pittsburgh Telephone Company ("Company") has created a Company Policy document which fully acknowledges the Company's commitment to protecting Customer Proprietary Network Information ("CPNI") and which informs its employees and any agents acting on the Company's behalf that they are required to follow the specific CPNI Operating Guidelines which accompany the Company CPNI Policy Statement. (See attached.) The Company CPNI Operating Guidelines set forth the specific Company policies and operating guidelines that are to be used by all employees in regard to the permitted use, disclosure and protection of CPNI. (See the attached summary of Company guidelines.) The guidelines were developed and are maintained so as to be in compliance with 47 C.F.R. Part 64, Subpart U. A copy of the Company's CPNI Policy Statement and the CPNI Operating Guidelines were each sent to all management employees in the fourth quarter of 2007. Training sessions were held during the year to educate those employees with access to and who administer CPNI on behalf of the Company including all applicable non-management employees.

In addition, the Company also provides a copy of the document entitled "Secrecy of Communications/Confidentiality of Customer Communications" to each employee annually and requires written confirmation from every employee that they have read and understand the Company Policy set forth in the document and that they have received a personal copy. (See attached.) These written confirmations are kept on file in the Company's Human Resources Department. Also a copy of the document is provided to all new employees and written acknowledgement is required at the beginning of employment.

Based on my personal review of the Company operating procedures related to the protection of CPNI, to the best of my knowledge and belief, the Company during the 2007 year has established operating procedures that are adequate to ensure compliance with the FCC Rules as set forth at 47 C.F.R. Part 64, Subpart U, regarding the protection of CPNI.

Respectfully submitted,

NORTH PITTSBURGH TELEPHONE COMPANY



Kevin J. Albaugh
Vice President-Regulatory Affairs

KJA/vb

NORTH PITTSBURGH TELEPHONE COMPANY **STATEMENT OF COMPANY POLICY**

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of North Pittsburgh Telephone Company.

North Pittsburgh Telephone Company (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released *only* in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 CFR 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.

North Pittsburgh Telephone Company (Company) adheres to the following guidelines:

General Company Policies

The Company uses, discloses, or permits access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

The Company shares CPNI only among the carrier's affiliated entities that provide a service offering to the customer. Except as noted herein, the Company does not share CPNI with its affiliates from which its customer does not take service.

The Company does not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from the Company, unless the Company has customer approval to do so, except in accordance with exceptions described below that are consistent with 47 CFR § 64.2006(c), or Section 222 does not apply to the service offered.

Company Policies Regarding the Notice Required for Use of Customer Proprietary Network Information.

Prior to any solicitation for customer approval, the Company provides notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

The Company may seek alternatively either "opt-in" or "opt-out" approval consistent with applicable FCC requirements in order to obtain authorization to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. The Company, subject to opt-out approval or opt-in approval, may disclose its customer's individually identifiable CPNI, for the purpose of marketing communications-related services to that customer, to its agents; its affiliates that provide communications-related services; and its joint venture partners and independent contractors. The Company also permits such persons or entities to obtain access to such CPNI for such purposes. Any such disclosure to or access provided to joint venture partners and independent contractors is undertaken in compliance with Joint Venture/Contractor safeguards set forth in Commission rules.

Except for use and disclosure of CPNI that is permitted without customer approval under 47 CFR § 64.2005, or is otherwise permitted under section 222 of the Communications Act of 1934, as amended, the Company uses, discloses, or permits access to its customer's individually identifiable CPNI subject to opt-in approval only.

Company Policies Regarding Safeguards for Use of Customer Proprietary Network Information.

Marketing - The Company maintains a record, electronically or in some other manner, of its own and, as may exist, its affiliates' sales and marketing campaigns that use its customers' CPNI. The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company retains the record for a minimum of one year.

Customer Service - All Company Service Representatives are trained and have an understanding of when they are and are not authorized to use CPNI. All Company employees are required to follow Company guidelines regarding the confidentiality of CPNI, and the Company has a disciplinary process in place.

Carrier Access Billing System (CABS)

CPNI records are maintained in an electronic format in the Carrier Access Billing System with restricted access. Access to CPNI is limited to CABS personnel who need the information to perform their job. CPNI information stored in the Carrier Access Billing System is protected by three layers of password protection.

The Company has a supervisory review process regarding its compliance with applicable FCC rules for outbound marketing situations and maintains records of its compliance for a minimum period of one year. The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Customer Initiated Telephone Contact

Carriers and interconnected VoIP providers, including the Company, are prohibited from releasing **CPNI call detail information** (such as the date, the called number, the length of the call etc.) based on a customer-initiated telephone contact unless one of the following criteria apply: (1) the customer provides a pre-established password to the Company customer service representative; (2) the Company customer service representative calls the customer back at the telephone number of record in order to disclose any requested specific call detail record information; or (3) the Company customer service representative mails the requested call detail information to the customer's address of record.. However if we choose to use passwords, **the passwords must not be publicly available personal history information** (such as a social security number or a mother's maiden name)

On-Line Account Access

On-line account access to all CPNI (not just call detail information) must be password protected. The Company already utilizes password protection on all on-line account access.

Retail Location Account Access

Customers requesting CPNI at a retail location where they walk into a business office must produce a valid photo identification matching the customer of record name on the customer account.

Notice Requirements- Account Changes

The Company must have procedures in place to immediately notify a customer of changes to the customer's account, including whenever a password, customer response to a carrier-designated back-up means of authentication (i.e. shared secret), online account or address of record is created or changed.

Notice Requirements- Breach of CPNI

If an employee becomes become aware of any suspected breach of CPNI protections, he or she is instructed to immediately notify the head of Regulatory Affairs for the Company who will then be responsible, in consultation with legal counsel, for determining if we have experienced a breach and then notifying law enforcement which includes the Secret Service and the Federal Bureau of Investigation.

Record of Breaches and Notification

We also keep a record of all discovered breaches and notifications of law enforcement. We also have procedures in place to notify law enforcement pursuant to FCC rules and procedures.

NORTH PITTSBURGH SYSTEMS, INC.

SECRECY OF COMMUNICATIONS/CONFIDENTIALITY
OF CUSTOMER COMMUNICATIONS

The responsibility of this Company and its employees is to maintain the secrecy and confidentiality of customer communications because the public has placed its trust in the integrity of the Company and its employees. This secrecy and confidentiality is a requirement of Company rules, as outlined in General Instruction E1.7, the regulations of the Pennsylvania Public Utility Commission (PAPUC) at 52 PA C.S. s63.131 and any applicable federal laws.

Definitions

- Customer communications – A customer voice or data communication, made in whole or in part by wire, cable, microwave or other means for the transmission by a telephone company of communications between the point of origin and the point of reception by a telephone company.
- Customer information – Information regarding a customer of NPSI or information regarding the services or equipment ordered and used by that customer. The term includes the customer's name, address and telephone number, occupation, information concerning toll calls, collect calls and third party billed calls, local message detail information and information concerning services ordered or subscribed to by a customer. The term also includes bills, statements, credit history, toll records whether on paper, microfiche, or electromagnetic media; computer records; interexchange carrier selection, service problems and annoyance call records.

Secrecy of Communications include, but are not limited to the following:

- DO NOT tamper with or intrude upon any type of transmission or communications be it voice, non-voice, data, etc. except as required to provide service.
- DO NOT listen to, monitor or record any conversation between customers, any transmission or data or any other non-voice communication or divulge their existence, except as required in the proper management of the business.
- DO NOT use, personally or for the benefit of others, information from any communication.
- DO NOT permit anyone to tamper with the communication facilities of the Company or to have unauthorized access to the Company premises.
- DO NOT disclose any customer information except as required to provide service.

Only those employees with a legitimate need to use customer information in the performance of their work duties and because of the nature of their duties, need to examine such data in order to accomplish the legitimate and lawful activities necessarily incident to the rendition of service by the Company, shall have access to customer confidential information.

If a law enforcement organization, another authority or any other person asks for information that should be kept private, either by law or by Company regulations, refer the request to:

North Pittsburgh Telephone Co. - Service Manger,
Penn Telecom – Manager - Regulatory & Legal
Nauticom – Administrative Manager.

An employee with questions concerning their access to, or release of, Customer Communications, should consult their supervisor.

“By my signature and date below I acknowledge that I have read and understood the above Secrecy of Communications Policy and that I have received my personal copy of the 52 PA C.S. s63.131 Confidentiality of Customer Communications and Information. I further understand that failure to follow the practice may result in disciplinary action, including termination of employment, if appropriate, and civil or criminal action provided for in the law for such violations.”

Employee's Printed Name

Management's Printed Name

Employee's Signature

Management's Signature

Date

Date

Exhibit B

**ACCOMPANYING STATEMENT
OF
NORTH PITTSBURGH TELEPHONE COMPANY
REGARDING
ANY ACTIONS TAKEN AGAINST DATA BROKERS DURING 2007**

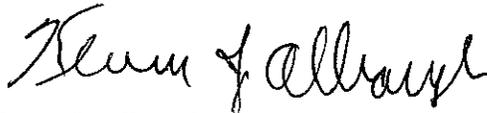
Under current North Pittsburgh Telephone Company ("Company") operating procedures in regard to the protection of CPNI, Company personnel are forbidden to divulge CPNI to any unauthorized person. Requests from any person or entity for CPNI where that person or entity is not the customer of record for that particular account are denied. Company procedures consistent with all current federal and state rules regarding customer initiated contacts, whether over the telephone or on line or in person, are in place. Those operating procedures ensure that CPNI is not shared with data brokers.

Based on information provided by those Company department heads who manage employees who have access to CPNI and who are responsible for responding to customer initiated requests for CPNI, the current Company operating procedures regarding the protection of CPNI and the safeguards that are in place in the business office to prevent the unauthorized release of CPNI to data brokers are sufficient and adequate and ensure that no unauthorized release of CPNI to data brokers occurred during 2007.

Based on my review of the Company Statement of Policy and the Company Operating Guidelines which have been provided to all applicable employees with access to CPNI, as well as my review of the Company operating procedures, especially those related to customer initiated contacts, whether in person, over the phone or on line, to the best of my knowledge and belief, the Company during 2007 took all necessary actions to prevent the unauthorized release of CPNI to data brokers.

Respectfully submitted,

NORTH PITTSBURGH TELEPHONE COMPANY



Kevin J. Albaugh
Vice President-Regulatory Affairs

KJA/vb

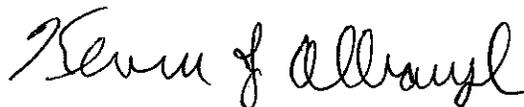
Exhibit C

**NORTH PITTSBURGH TELEPHONE COMPANY
SUMMARY OF CUSTOMER COMPLAINTS
REGARDING
UNAUTHORIZED RELEASE OF CPNI DURING 2007**

To the best of my knowledge and belief, North Pittsburgh Telephone Company had no unauthorized releases of CPNI during 2007.

Respectfully submitted,

NORTH PITTSBURGH TELEPHONE COMPANY

A handwritten signature in cursive script that reads "Kevin J. Albaugh".

Kevin J. Albaugh
Vice President-Regulatory Affairs

KJA/vb