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February 25, 2008

**FILED ELECTRONICALLY**

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

**EB Docket 06-36  
Annual Section 64.2009(e) CPNI Certification  
Spruce Knob Seneca Rocks Telephone, Inc. (499 Filer ID: 805923)**

Dear Ms. Dortch:

On behalf of Spruce Knob Seneca Rocks Telephone, Inc. ("SKSR"), and pursuant to Section 64.2009(e) of the Commission's rules, I am attaching SKSR's Annual CPNI Certification and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

/s/

Jason P. Hendricks  
Senior Consultant

cc: FCC Enforcement Bureau  
BCPI

Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2007

Date filed: February, 2008

Name of company covered by this certification: Spruce Knob Seneca Rocks Telephone, Inc.

Form 499 Filer ID: 805923

Name of signatory: Ivan "Sonny" O'Neil

Title of signatory: President

I certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company 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 the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. This statement also explains what steps the company is taking to protect CPNI.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company does not have any information with respect to the processes pretexters are using to attempt to access CPNI.

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

Signed Ivan "Sonny" O'Neil

Accompanying Statement  
To 2007 CPNI Annual Certificate  
Spruce Knob Seneca Rocks Telephone, Inc.

Spruce Knob Seneca Rocks Telephone, Inc. ("SKSR") adheres to all CPNI rules found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations (Sections 64.2001 – 64.2011) concerning the proper use of our customers' CPNI.

SKSR has established procedures requiring company personnel to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Employees must properly authenticate a customer prior to disclosing CPNI.

SKSR has implemented a detailed Policies and Procedures Manual on the use, and safeguarding, of CPNI. The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and signed by all company employees. In addition, all current SKSR employees have been thoroughly trained on the use, and safeguarding, of CPNI and all new employees receive similar training upon hire.

SKSR uses CPNI for marketing purposes and our customer notices for use of CPNI approval meets all of the requirements contained in the FCC rules, including those specified in Section 64.2008.

To further protect our customer's privacy, we have implemented all of the safeguards contained in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of SKSR Telecom's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Signed *Juan "Sonny" O'Neil*