



YourTel America, Inc.  
2800 E 18<sup>th</sup> Street  
Kansas City, MO 64127

February 26, 2008

Via ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**

Dear Ms. Dortch,

YourTel America Inc. hereby re-submits its annual CPNI compliance certificate and accompanying operating procedural document in its entirety correcting the following filing errors:

- 1) Original filing cover letter was missing company name in language; corrected.
- 2) Filing electronically submitted as Document Type: Report; corrected.
- 3) Filed on Behalf of listed submitter name, not company name; corrected.

There have been no changes made to the certificate or accompanying procedural document in this re-submission. If there are any questions concerning this re-submission, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Matt Connolly". The signature is written in a cursive, slightly slanted style.

Matt Connolly  
816-388-1066

[mconnolly@yourtel.com](mailto:mconnolly@yourtel.com)

cc: Enforcement Bureau, Telecommunications Consumers Division (2 hard copies)  
Best Copy Printing, Inc. via email (1 copy)



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**RE: EB Docket No. 06-36**

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.2009(e), YourTel America Inc. hereby submits its annual CPNI compliance certificate and accompanying operating procedural document.

If there are any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Matt Connolly".

Matt Connolly  
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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007.

Filed this 25 day of February, 2008.

Company Name: YourTel America, Inc.

Form 499 Filer ID # 813247

Signatory Name: Dale R. Schmick

Signatory Title: Chief Executive Officer

I, Dale R. Schmick, a duly authorized officer of the company named above, and acting as an agent of the Company, hereby certify that I have personal knowledge that the Company has operating procedures that are adequate to endure compliance with the Commission's CPNI rules.

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.

The Company has not taken any actions against data brokers in the past year.

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



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Dale R. Schmick - CEO  
YourTel America, Inc.

*2/25/2008*

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Date

**STATEMENT REGARDING COMPLIANT OPERATING PROCEDURES  
REGARDING 47 C.F.R. PART 64 SUBPART U  
GOVERNING USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

The following statement explains the internal procedures of YourTel America, Inc. ("YourTel" or the "Company") to ensure that it is in compliance with the Commission's CPNI rules.

YourTel only uses CPNI internally for the purpose of providing, maintaining and/or repairing a customer with the requested service and to bill and collect for services rendered. We only disclose CPNI in compliance with these or any state or federal laws, court order, subpoena or upon affirmative written request by the customer to any person designated by the customer.

Key aspects of YourTel's security policies and procedures with respect to any customer data it does come in contact with are:

- *Need to Know* – YourTel only allows employee access to customer information on a need-to-know basis. The Company has trained all personnel and will train new personnel with access to CPNI and has a documented disciplinary process in place for non-compliance.
- *Physical Security* – YourTel maintains physically secure facilities for the storage of all customer data.
- *Computer Security* – YourTel maintains customer data within computer infrastructure accessible by authorized personnel only.

The Company requires the use of a government issued, valid photo I.D. as a means of customer authentication in its retail stores. The Company requires new customers to set up passwords for their accounts. The Company requires Customer's to visit stores to enable password resets or changes or, if physically unable to do so, be authenticated by a call to the telephone number of record.

The Company requires the use of a password to discuss CDR CPNI over the phone.

The Company notifies customers of changes to their Address of Record or Account Password via a hard copy mailing.

The Company has documented CPNI Breach Procedures reflecting instructions as outlined in § 64.2011.

The Company does not provide online access to customer CPNI.

The Company has not sought approval of the use of CPNI as the Company does not use CPNI in any sales or marketing campaign other than what is permitted under § 64.2005. No sales or marketing campaign can be conducted without management approval and such campaign would require supervisory review to assure compliance with the CPNI rules.

The security of customer information is of paramount importance to YourTel, and the Company will continue to develop and implement operating procedures for the protection of customer data.