

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

February 27, 2008

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

RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2007
Rural Telephone Service Company, Inc.
Form 499 Filer ID #804438

Dear Ms. Dortch:

The accompanying certification and statement is filed in response to the Public Notice issued by the Commission January 29, 2008, *EB Provides Guidance on Filing of Annual Customer Proprietary Network Information (CPNI) Certifications Under 47 C F R. §64.2009(e), EB Docket No 06-36*.

I, Rhonda S. Goddard, certify that I am Chief Operating Officer of Rural Telephone Service Company, Inc., 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. Section 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.

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) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e g* instances of improper access by employees, instances of improper disclosure to

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individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

As directed, two copies of this report have been submitted to the Enforcement Bureau of the Federal Communications Commission, and one copy has been submitted to Best Copy and Printing, Inc.

All inquiries in connection with this filing should be addressed to our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda S. Goddard". The signature is fluid and cursive, with a large initial "R" and "S".

Rhonda S. Goddard
Chief Operating Officer
Rural Telephone Service Company, Inc.

RSG/ckw

Enclosures

cc: Federal Communications Commission
Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

Statement of CPNI Operating Procedures

Rural Telephone Service Company, Inc.

Rural Telephone Service Company, Inc. hereby submits that its procedures regarding its Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 C.F.R. §§64.2001-64.2009.

Rural Telephone Service Company, Inc. uses its CPNI in compliance with the Commission's rules in 47 C.F.R. §§64.2001-64.2009. It has provided proper, individual notice to each of its customers and, depending upon use, has given its customers the required regulatory time period to either allow usage of CPNI or disallow CPNI usage.

Rural Telephone's employees, including marketing, sales and customer service representatives, have been educated about CPNI, federal regulations and Rural Telephone's statutory responsibility to its customers. Any unauthorized use, sale, or other disclosure of CPNI by any employee would subject the employee to disciplinary action. For the first violation, an employee would be given a warning and the violation would be noted on the employee's record. A second violation would result in termination of employment.

By accessing company records, employees may easily determine the CPNI status of individual customers prior to using CPNI. Rural Telephone Service Company, Inc. maintains a written log regarding outbound usage of CPNI, including a description of the marketing activity, which products and/or services were marketed, and the specific CPNI used. All sales and marketing personnel obtain supervisor approval for any outbound usage of CPNI. Rural Telephone Service Company, Inc. does not sell, rent or otherwise disclose CPNI to non-affiliated entities. If Rural Telephone's affiliates are allowed to access CPNI, such disclosure is noted in the written log.

In compliance with the Commission's rules, Rural Telephone Service Company, Inc. does not use, disclose or permit access to CPNI for the purposes of identifying customers placing calls to competing carriers. Furthermore, Rural Telephone has implemented appropriate safeguards for the disclosure of CPNI, including instituting procedures to (1) authenticate customers prior to disclosure of CPNI based on customer-initiated telephone contact, online account access, or an in-store visit (e.g., use of verbal or online passwords without the use of readily available biographical or account information, or requiring a valid photo ID matching the customer's account information); and (2) providing notification to customers of account changes. Rural Telephone has also established procedures to notify law enforcement in the event of a breach of CPNI.

**2007 ANNUAL CERTIFICATION – Customer Proprietary Network Information
Procedures of Rural Telephone Service Company, Inc.**

I, Rhonda Goddard, hereby certify that I have personal knowledge that Rural Telephone Service Company, Inc. has established operating procedures regarding the Customer Proprietary Network Information generated by the customers of Rural Telephone Service Company, Inc. These procedures, described on the attached pages, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR §§64.2001-64.2011.

Signed: 

By: Rhonda Goddard
Chief Operating Officer-Regulated

Date: 12/31/2007