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

EB Docket 06-36

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

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 28, 2008

Name of company covered by this certification: Union Telephone Company

Form 499 Filer ID: 805323

Name of signatory: John G. Woody

Title of signatory: Vice President

I, John G. Woody, 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.

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

Signed



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STATEMENT

Union Telephone Company (“Union Telephone”) has established operating procedures that ensure compliance with the Federal Communications Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).

- Union Telephone has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Union Telephone continually educates and trains its employees regarding the appropriate use of CPNI. Union Telephone has established disciplinary procedures should an employee violate the CPNI procedures established by Union Telephone.
- Union Telephone maintains a record of its and its affiliates’ sales and marketing campaigns that use its customers’ CPNI. At this time Union Telephone does not allow third party access. However, Union Telephone will maintain a record of any and 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.
- Union Telephone has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, Union Telephone’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Union Telephone took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Union Telephone at a state commission, in the court system, or at the Federal Communications Commission: there were no data broker incidents in 2007.
- The following is information Union Telephone has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: Union Telephone used a variety of methods to authenticate customers prior to disclosing CPNI and is in the process of establishing procedural and system requirements for passwords for use when discussing Call Detail Records with the customer of record. Union Telephone does not use CPNI for marketing purposes. There were no instances of improper access during the period.



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- The following is a summary of all customer complaints received in 2007 regarding unauthorized release of CPNI:
 - Number of customer complaints Union Telephone received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0
 - Category of complaint:
 - 0 Number of instances of improper access by employees
 - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
 - 0 Number of instances of improper access to online information by individuals not authorized to view the information
 - 0 Number of other instances of improper access or disclosure
 - Description of instances of improper access or disclosure: No instances of improper access or disclosure.



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CPNI Statement of Disciplinary Action

Union Telephone is committed to taking every possible precaution to keep all customer information confidential. It is the understanding of every customer service representative that no customer information is to be shared with any individual outside of Union authorized employees, unless that individual has been confirmed as the owner of the account, or has been approved by the owner to access account information.

If it is discovered that prior to sharing customer information, a Union employee did not confirm the identity of anyone asking for this information, that employee may be terminated by Management, pending a thorough review of the circumstances surrounding this situation.