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February 29, 2008

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

Dear Ms. Dortch;

Enclosed on behalf of Graceba Total Communications, Inc. (Form 499 Filer ID 802146) please find the Customer Proprietary Network Information (CPNI) certification and statement of procedures.

Should you require additional information, please do not hesitate to contact me. I can be reached at (706) 645-3966 or via email at bruce.schoonover@knology.com

Sincerely,



Bruce Schoonover, Jr.
Director – Regulatory Affairs
Knology, Inc.

Enclosures

cc: Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

Certificate
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 29, 2008

Name of Company covered by this certification: Graceba Total Communications, Inc.

Form 499 Filer ID: 802146

Name of Signatory: Chad Wachter

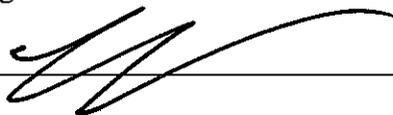
Title of Signatory: VP, General Counsel and Secretary

I, Chad Wachter, 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 insure 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 (proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in 2007. Customer service and sales personnel are trained on the need to maintain the confidentiality of CPNI and to be alert to attempts by unauthorized persons to access CPNI. All company personnel with access to CPNI records know that only properly identified and authenticated customers can have access to his/her CPNI. Any questionable activity with regard to the access to or the use or distribution of CPNI is immediately reported to the legal department and the Compliance Officer for review. The company has not detected any attempts by pretexters or other unauthorized persons to access CPNI.

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

Signed _____



Statement of Company Procedures
EB Docket No. 06-36

The following facts support the certification:

1. The company has not used any procedure to determine whether a customer consents to the use of its CPNI for internal marketing of communications related services to the customer because the company did not market in such a manner in 2007. The company notifies all customers of the company's privacy policy and the company's duty to protect CPNI and the customers' right to have that CPNI protected and not used for the purpose of marketing telecommunications services to them.
2. All customer care and sales personnel are trained at least annually by their respective supervisors on the policies and procedures of the company including those that are applicable to CPNI protection and use. The customer care group is trained frequently throughout the year on CPNI. Personnel are trained and monitored on customer authentication using information other than readily available biographical customer information.
3. The company did not initiate a password authentication for customer access to his/her CPNI in 2007. The company does not have online customer access to CPNI.
4. The company did not conduct any sales and marketing campaigns in 2007 using CPNI. The company did not need or seek any opt-in consents. The company does not use a joint venture partner or third parties for the purpose of marketing communications related services to customers.
5. The company did not release any CPNI to third parties for marketing or any other purposes in 2007.
6. The supervisors of the company's sales and customer care operations monitor data security on a daily basis. No use of CPNI is authorized without approval of the appropriate supervisory personnel. Release of CPNI to law enforcement or through other legal process must be reviewed and approved by the Compliance Officer. All marketing information and materials are reviewed by the Compliance Officer before use or deployment. The unauthorized access to or use or disclosure of CPNI is punishable under the company's policies by disciplinary actions up to and including termination of employment.