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## FILED ELECTRONICALLY VIA ECFS

February 29, 2008

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

RE: IBFA Acquisition Company, LLC  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

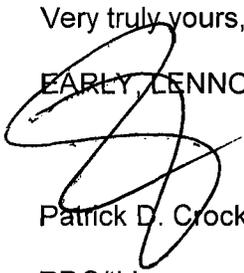
Dear Ms. Dortch:

Pursuant to 47 C.F.R. 64.2009(e) please find attached the 2007 Annual CPNI Certification and Accompanying Statement filed on behalf of IBFA Acquisition Company, LLC. These documents are submitted in accordance with the directive set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Please contact the undersigned should you have any questions or concerns at (269) 381-8844 or [pcrocker@earlylennon.com](mailto:pcrocker@earlylennon.com).

Very truly yours,

EARLY, LENNON, CROCKER & BARTOSIEWICZ, P.L.C.



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PDC/tld

cc: FCC Enforcement Bureau (2 copies via USPS Mail)  
Best Copy and Print, Inc. (via e-mail [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

**Customer Proprietary Network Information Annual Certification of Compliance**  
**Pursuant to 47 C.F.R. § 64.2009(e)**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for year 2007.

Date filed: February 29, 2008

Company covered by this Certification: IBFA Acquisition Company LLC

Form 499 Filer ID: 825416

Name of Signatory: Ray Powers

Title of signatory: Executive Vice-President

I am the Executive Vice-President of IBFA Acquisition Company LLC and as such do hereby certify, affirm, depose and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of IBFA Acquisition Company LLC. I have personal knowledge that IBFA Acquisition Company LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how IBFA Acquisition Company LLC procedures ensure compliance with the requirements set forth in 47 C.F.R. § 64.2001 et seq.

IBFA Acquisition Company LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, IBFA Acquisition Company LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2007. IBFA Acquisition Company LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps the Company is taking to protect CPNI.

This certification is dated this 19 day of February, 2008.

  
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Ray Powers  
Executive Vice-President  
IBFA Acquisition Company LLC

## **Customer Proprietary Network Information Certification Accompanying Statement**

IBFA Acquisition Company, LLC ("IBFA") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 — 64.2011 of the Commission's rules. This attachment summarizes IBFA's practices and procedures, which have been updated to adequately ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

### **Safeguarding against pretexting**

- IBFA takes reasonable measures to protect CPNI and believes that these measures sufficiently prevent unauthorized access to CPNI.

### **Training and discipline**

- IBFA has trained its personnel in the appropriate use of CPNI. All employees with access to CPNI are required to review and comply with IBFA's CPNI policies and procedures.
- IBFA has disciplinary process in place for violations of IBFA's CPNI policies and procedures which would encompass any misuse of CPNI.

### **IBFA'S use of CPNI**

- IBFA does not share, disclose, or otherwise provide CPNI to third parties.
- IBFA may use CPNI for the following purposes:
  - > To initiate, render, maintain, repair, bill and collect for services;
  - > To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - > To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent; and
  - > To market additional services to customers that are within the same categories of service to which the customer already subscribes.
- IBFA does not disclose or permit access to CPNI to track customers that call competing service providers.
- IBFA discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

### **Customer approval and informed consent**

- IBFA does not use CPNI for any purpose that would require customer approval to do so. IBFA does not use CPNI for any marketing purposes and does not share, disclose, or otherwise provide CPNI to any third party. If this policy changes in the future, IBFA will implement practices and procedures to ensure compliance with the Commission's CPNI regulations.

### **Additional safeguards**

- IBFA has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- IBFA designates one or more officers, as an agent or agents of the company, to sign and file a CPNI Compliance Certificate on an annual basis. The Certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- IBFA properly authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-person visit.
- IBFA notifies customers immediately of any account changes.
- IBFA may negotiate alternative authentication procedures for services that IBFA provides to business customers that have both a dedicated account representative and a contract that specifically addresses IBFA's protection of CPNI.
- In the event of a breach of CPNI, IBFA will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs IBFA to delay notification, or IBFA and the investigatory party agree to an earlier notification. IBFA will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.