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February 29, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB Docket 06-36, Request for Confidentiality Pursuant to 47 C.F.R. § 0.459

Dear Ms. Dortch:

Pursuant to Section 0.459 of the Commission's Rules, 47 C.F.R. § 0.459, Armstrong Telephone Company – Maryland, Armstrong Telephone Company – New York, Armstrong Telephone Company – Pennsylvania, Armstrong Telephone Company – West Virginia, Armstrong Telephone Company – Northern Division, Armstrong Telephone Company – North (collectively "Armstrong") hereby requests that the document entitled "CPNI Compliance Policies of Armstrong Telecommunications, Inc." provided to the Enforcement Bureau on the date of this letter in a separate envelope marked confidential, be designated by the Commission as confidential and not be made routinely available for public inspection. A redacted public version of this document was filed today with the Commission in EB Docket 06-36 attached to Armstrong's CPNI Compliance Certificate filed pursuant to Section 64.2009(e) of the Commission's Rules, 47 C.F.R. § 64.2009(e).

The redacted version of this document contains information that could be misused by unauthorized persons to attempt to obtain our customers' CPNI, which Armstrong has a duty to protect from unauthorized disclosure. *See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Report and Order and Further Notice of Proposed Rulemaking, FCC 07-22, n.167 (rel. April 2, 2007) ("We recognize carrier concerns about providing a roadmap for pretexters with this annual filing, and thus we will allow carriers to submit their certifications confidentially with the Commission.").

The redacted information is not available to the public, and Armstrong takes all reasonable precautions to avoid public disclosure of this confidential information. Armstrong prominently marks all non-redacted copies of the policy as confidential, and restricts its employees from distributing the policy or associated training materials except to employees and

parties approved by its CPNI Compliance Manager. For the foregoing reasons, Armstrong requests that the non-redacted version of its CPNI submission to the Bureau not be made routinely available for public inspection.

Respectfully submitted,

Paul B. Hudson
Counsel for Armstrong Telecommunications, Inc.

cc: Marcy Greene, Enforcement Bureau