



DOCKET FILE COPY ORIGINAL

7852 Walker Drive, Suite 200, Greenbelt, MD 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

FILED/ACCEPTED

FEB 22 2008

Federal Communications Commission
Office of the Secretary

BY HAND DELIVERY

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

EB Docket No. 06-36
EB-06-TC-060

Re: **CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 22, 2008**

Riviera Telephone Company, Inc.

499 Filer ID # 803310

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
2 copies to Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 044
List ABCDE

Echelon Building II, Suite 200,
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
Fax: 512-346-0822

Egandale Corporate Center, Suite 310
1380 Corporate Center Curve
Eagan, Minnesota 55121
Phone: 651-452-2660
Fax: 651-452-1909

547 South Oakview Lane
Bountiful, UT 84010
Phone: 801-294-8576
Fax: 801-294-5124

4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
Phone: 770-569-2105
Fax: 770-410-1608

RIVIERA TELEPHONE COMPANY, INC.
P.O. Box 997, Riviera, Texas 78379 (361) 296-3232
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

FILED/ACCEPTED

FEB 22 2008

Federal Communications Commission
Office of the Secretary

Annual 64.2009(e) CPNI Certification for 2007

Date signed: 02/08/2008

Riviera Telephone Company, Inc. (RTC):

499 Filer ID

803310

Name of signatory: Mr. Bill Colston, Jr.

Title of signatory: President and General Manager

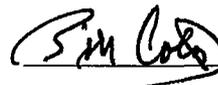
I, Bill Colston, Jr., certify that I am an officer of the company ("RTC") named above and acting as an agent of RTC, that I have personal knowledge that RTC has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how RTC's procedures ensure that RTC is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

RTC 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 in 2007 or related to 2007. RTC is not aware of any attempts by pretexters to access the CPNI of RTC customers and thus has not had to take any actions against data brokers. RTC has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

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

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Attachment

RIVIERA TELEPHONE COMPANY, INC.

499 Filer ID 803310

P.O. Box 997, Riviera, Texas 78379 (361) 296-3232

**2007 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 8, 2008**

This statement serves to explain how Riviera Telephone Company ("RTC"), is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, RTC has not used nor plans to use CPNI for marketing. For marketing purposes, RTC uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

RTC has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

RTC has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how RTC uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

RTC has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

RTC has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

RTC does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, RTC will initiate the notification and Opt-Out process. RTC does not provide CPNI to other parties and thus has not used the opt-in approval process. RTC has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, RTC will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, RTC will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

During 2007, RTC implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

RTC provides customers with on-line access to customer account information for which RTC has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

RTC has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

RTC has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, RTC makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.

9. Disciplinary Process

RTC has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, RTC will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

RTC has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.