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**Communication Specialists Company of Wilmington, LLC  
3330 Wrightsville Avenue  
Wilmington, NC 28403:**

Received & Inspected

FEB 22 2008

FCC Mail Room

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

**INCOMPLETE DOCUMENTS REGARDING COMPLIANCE WITH CPNI  
REQUIREMENTS WERE ERRONEOUSLY MAILED TO YOUR OFFICE ON  
2/14/08.**

**ENCLOSED ARE THE CORRECT DOCUMENTS.**

**S. F. McNeill**



**COMMUNICATION SPECIALISTS  
OF WILMINGTON, LLC**

**3330 WRIGHTSVILLE AVENUE  
WILMINGTON, NC 28403  
910-791-9773**

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

Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007  
EB Docket No. 06-36**

FRN: 0001961903

CERTIFICATION

I, S. F. McNeill, hereby 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 effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI.

S. F. McNeill

Name:

Title: President

fmcneill@comspeco.net

Date: February 19, 2008

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# **COMMUNICATION SPECIALISTS OF WILMINGTON, LLC**

**3330 WRIGHTSVILLE AVENUE  
WILMINGTON, NC 28403  
910-791-9773**

FRN: 0001961903

## **STATEMENT**

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains 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.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier'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.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.

- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: None
- The following is information Carrier 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: Carrier has no information.
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier 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 customer complaints, improper access or disclosure: No instances

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S. F. McNeill

Name:

Title: President

[fmceill@comspeco.net](mailto:fmceill@comspeco.net)

Date: February 19, 2008

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