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

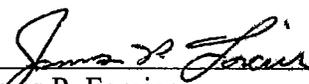
Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007**
EB Docket No. 06-36

Form 499 Filer ID: 820896

CERTIFICATION

I, James P. Forcier, hereby certify that I am an officer of Westelcom Networks, Inc., 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 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 rules.



Name: James P. Forcier
Title: President
Date: February, 25, 2008

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Westelcom Networks, Inc.

Address: 2 Champlain Ave
Westport, NY 12993



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STATEMENT

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

- Westelcom Networks, Inc. has implemented procedures whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Westelcom Networks, Inc. continually educates and trains its employees regarding the appropriate use of CPNI. Westelcom Networks, Inc. has established disciplinary procedures should an employee violate the CPNI procedures established by Westelcom Networks, Inc.
- Westelcom Networks, Inc. maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Westelcom Networks, Inc. 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.
- Westelcom Networks, Inc. has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Westelcom Networks, Inc. compliance for a minimum period of one year. Specifically, Westelcom Networks, Inc.'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.



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- Westelcom Networks, Inc. took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Westelcom Networks, Inc. at a state commission, in the court system, or at the Federal Communications Commission: No Actions needed against Data Brokers in 2007.
- Westelcom Networks, Inc. takes the following steps to protect against pretexting and to protect CPNI:
 - All customers are authenticated, either by password, back up question or valid Photo ID.
 - If authentication is not possible, the service representative calls the customer back at the telephone number of record, or suggests the customer come into the local business office with a valid photo ID or CPNI information is mailed to the customer at the address of record.
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
 - Number of customer complaints Westelcom Networks, Inc. received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: There were NO complaints in 2007.
 - 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: None.



Via Electronic ECFS Filing

March 1, 2008

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

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RE: Certification of CPNI Filing, EB-06-TC-060

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules⁵ and the Commission's *Public Notice*, DA 08-171, dated January 29, 2008 in the above-captioned matter, CIMCO Communications, Inc. hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that CIMCO Communications, Inc. has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

CIMCO Communications, Inc. has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Each employee receives an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval; I am responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,

CIMCO COMMUNICATIONS, INC.

William Dvorak
Chief Operations Officer

⁵ 47 C.F.R. §64.2009(e).

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