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**FCC Mail Room**

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

February 28, 2008

**Subject: Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Dear Secretary Dortch,

Enclosed is the revised Annual 47 C.F.R. 64.2009(2) CPNI Certification for the Delhi Telephone Company. A copy of this document was forwarded to the Federal Communications Commission and to Best Copy and Printing Inc.

If you have any questions or concerns, please contact me at 607-746-1527.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Oles', is written over a horizontal line.

Stephen Oles  
CPNI Compliance Office

No. of Copies rec'd 0  
List ABCDE

Internet Service :: Cable Television :: Long Distance :: Computer Networking  
P.O. Box 271, Delhi, New York 13753 :: VOICE: 607-746-1500 :: FAX: 607-746-7991



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Annual 47 C.F.R. 64.2009(e) CPNI Certification

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 28, 2008

Name of company covered by this certification: Delhi Telephone Company

Form 499 Filer ID: 808848

Name of signatory: Stephen Oles

Title of signatory: CPNI Compliance Officer

**CERTIFICATION**

I am the CPNI Compliance Officer for the Delhi Telephone Company. I hereby certify that I have personal knowledge that Delhi Telephone Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 et seq. Accompanying this certificate is a statement explaining how Delhi Telephone Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. The Delhi Telephone Company 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) against data brokers in the past year. The Delhi Telephone Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

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

A handwritten signature in black ink, reading 'Stephen Oles', is written over a horizontal line. The signature is cursive and fluid.

Stephen Oles  
CPNI Compliance Officer  
Delhi Telephone Company

February 28, 2008

Attachment

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Delhi Telephone Company – FCC 499 Filer ID 808848

## STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Delhi Telephone Company, an ILEC operating in New York (“the Company” or “Company”) are 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. §§ 64.2009(e)).

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

### **1. Identification of CPNI**

The Company 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 FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

### **2. Identification of Services Affected by CPNI Rules**

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

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

### **4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.



## **5. Customer Notification and Authorization Process**

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

## **6. Training**

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

## **7. Record of Customer CPNI Approval/Non-Approval**

The Company has developed a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

## **8. Disciplinary Process**

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

## **9. Software Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

## **10. Supervisory Review Process for Outbound Marketing**

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