

BLOOMINGDALE TELEPHONE COMPANY INC.  
BLOOMINGDALE COMMUNICATIONS INC.

We Connect You  
Date: February 22, 2008

Received & Inspected

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FCC Mail Room

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

**Re: EB-06-TC-060, EB Docket No. 06-36, Certification of CPNI Filing 2008**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2008", as ordered in EB-06-36

**Company Name(s): Bloomingdale Telephone Company,  
Bloomingdale Communications, Inc., & Southwest Michigan  
Communications, Inc. dba OnTrak Communications**

**Address: PO Box 187**

**City, State: Bloomingdale, MI 49026**

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

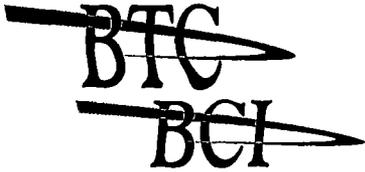
The attached Statement demonstrates such compliance.

Mark Bahnson  
Company Officer  
Dated: February 22, 2008

Attachment

cc: Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

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List A B C D E



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**CERTIFICATION OF CPNI FILING**  
**[Section 65.2009(e) of FCC Rules]**

FCC Mail Room

**EB-06-TC-060**  
**EB DOCKET NO. 06-36**

I hereby certify that I am an Officer of Bloomingdale Telephone Company, Bloomingdale Communications, Inc. and Southwest Michigan Communications, Inc dba OnTrak Communications.

I have personal knowledge that the Company [and its affiliates] established operating procedures that are designed to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. §§64.2001 through 64.2009). The attached Statement of CPNI Compliance explains how the Company's operating procedures ensure that it is in compliance with the foregoing FCC rules.

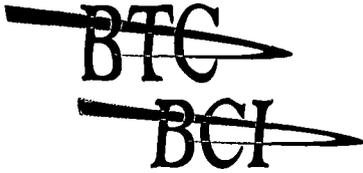
I am making this certification for the year 2007.

Signature

Mark Bahnson  
Assistant General Manager & CPNI Compliance Officer

FEBRUARY 22, 2008

Date



We Connect You

BLOOMINGDALE TELEPHONE COMPANY INC.  
BLOOMINGDALE COMMUNICATIONS INC.

February 22, 2008

Bloomington Telephone Co., Bloomington Communications, Inc. & Southwest Michigan Communications, Inc dba OnTrak Communications (the telephone company (ies)) are submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on February 2, 2006 in DA 06-258, pursuant to Section 64.2009(e) of FCC rules.

### **CPNI Operating Procedure**

From time to time the company (ies) may wish to inform customers of new, enhanced or beneficial features or services to customers. Information in the database will be used in order to determine which customers could be contacted. Before doing so, the customer must have granted permission to use this information for marketing purposes. This information is legally referred to as Customer Proprietary Network Information or CPNI.

### **Customer Notification**

Annually, existing customers are notified via a bill insert that they have the right to restrict use of the customer's CPNI. (Bill insert was distributed 3/1/07.) Within 30 days of the notification the customer must either call toll free 1-800-377-3130 or e-mail [staff@btc-bci.com](mailto:staff@btc-bci.com) to inform the telephone company that they wish to restrict the use of CPNI. If the customer does not contact the telephone company, they will be granting the telephone company the right to use the information. The approval or denial will not affect any service and will remain valid until the customers either revokes or limits the approval or denial. (See Sample A for text of the Bill Insert.)

### **Telephone Company's Commitment to CPNI Rules**

To the best of the Telephone Company's ability to comply with the FCC's CPNI rules is a nine-step process:

1. Designate a compliance officer.
2. Train and certify employees on CPNI requirements.
3. Observe Opt-In and Opt-Out requirements.
4. Notify customers of changes to their accounts.
5. Notify law enforcement *and customers* of any unauthorized disclosure of CPNI.
6. Establish disciplinary procedures for employee violations of CPNI rules.
7. Take measures beyond the FCC rules to discover and protect against pretexting and unauthorized disclosures of CPNI.
8. File annual certification by March 1.

## **Marketing with CPNI**

Only under the direction of the telephone company's Marketing Department may CPNI be used. Before using CPNI, the specific Marketing Plan must be approved by the Assistant General Manager/ CPNI Compliance Officer. The Marketing Department is responsible for maintaining and updating the customer database that has denied CPNI usage and the list will be stored in CPNI Folder on a secured company network. This Folder is available to all telephone company staff that has access to the network. A new customer database will be generated each time CPNI is used to ensure that only most current approved customers are contacted.

Upon completion of each marketing attempt, a sample of the communicated script, flyer, post card or however the sales information was presented to the customer using CPNI will be saved in a binder. Each attempt will also be documented. A description of what products or services were presented in the attempt. What parameters were used to select the customers in the attempt, e.g. "Customers with Dial-up Internet without Voicemail"? This record will be saved for no less than a year.

Each year the Assistant General Manager/CPNI Compliance Officer and the Marketing Department will review CPNI procedures and policies. The Assistant General Manager/CPNI Compliance Officer and the Marketing Department will review how CPNI rights are communicated to customers. The Assistant General Manager/CPNI Compliance Officer and Marketing Department will also review the methods of communicating this information.

Any instance where the telephone company CPNI procedures have not worked properly will be reported to the Assistant General Manager/CPNI Compliance Officer immediately.

Although the telephone companies customers were given the opportunity to opt-out, therefore giving the telephone companies Marketing Department permission to market to all remaining customers, the telephone companies chose not to market using CPNI information to those customers anytime during 2007.

### **CPNI Training**

The telephone company's staff received CPNI training using curriculum created by JSI a national telecommunications consultant. The telephone company staff will be trained and will certify that they were trained annually.

### **Data Broker Action in 2007**

The 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.

### **Customer Complaints about Unauthorized Release of CPNI**

The company has not received any customer complaints in the past year (2007) concerning the unauthorized release of CPNI (customer complaints that the telephone company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI (instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information)).

## Sample A

### **Important Notice About Your Account**

Recent changes in federal law allow us to use information (CPNI) from your current services with us to advise you of new products and services that may satisfy your communications needs. Such advice could include information on new packages that could reduce your monthly bill on services such as long distance, Internet, cable television, or other information that keeps you informed of the happenings of your local cooperative.

#### **What is CPNI?**

Customer Proprietary Network Information (CPNI) is information relating to the telecommunications services that you currently have with us.

#### **How can we use this information?**

This information can be used to advise you about innovative communications services and new communications technology or products. We DO NOT sell or in any way provide this information to any company other than any records we are required by law to provide.

#### **Who will be able to use this information?**

Only BTC-BCI will.

#### **Will BTC-BCI protect my information?**

YES!! You have the right, and we have the duty, under federal law, to protect the confidentiality of this information. Your information WILL NOT be given to anyone other than any records required by law.

#### **How can I give consent?**

No action on your part is necessary. If you do not contact us within 30 days and indicate that we may not use your information to continue providing you with marketing and educational mailings, we will continue to do so until you specify otherwise.

#### **What if I do not consent?**

You can contact us using the phone number or email address listed below and indicate that you are withdrawing your approval of our use of your CPNI. From that point forward you will not receive information from us tailored to your current services with us until you specify otherwise.

#### **If I consent, can I change my mind?**

Yes, you can contact us at any time. Until you do, your consent is valid.

#### **Contact information:**

BTC-BCI Office: 1-800-377-3130

Email: [staff@btc-bci.com](mailto:staff@btc-bci.com)



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The attached Statement demonstrates such compliance.

A handwritten signature in black ink, appearing to read 'Mark Bahnson'.

Mark Bahnson  
Company Officer  
Dated: February 22, 2008

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