

**AMEDNDED**

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

**EB Docket 06-36**

**Annual 64.2009(e) CPNI Certification for 2007**

**Date Filed: Originally February 5, 2008 as amended September 17, 2008**

**Name of Company: Carr Telephone Company and Carr Communications, Inc**

**Form 499 Filer ID: 803700**

**Signatory: Teresa Bogner**

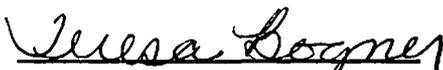
**Title: Secretary**

**I, Teresa Bogner, certify that I am an officer of both Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. 64.2001 *et seq.***

**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 Commission's rules.**

**The Companies have 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.**

**The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., 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).**

  
**Teresa Bogner, Secretary**

**AMENDED  
CERTIFICATE OF COMPLIANCE WITH PROTECTION OF  
CUSTOMER  
PROPRIETY NETWORK INFORMATION RULES  
FOR 2007 FILING YEAR**

**Teresa Bogner signs this Certificate of Compliance in accordance with §222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Carr Telephone Company and Carr Communications, Inc. (Companies) This certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Companies provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR 64.2001-2009.**

**On behalf of the Companies, I certify as follows:**

- 1. I am an officer of both Carr Telephone Company and Carr Communications. My business address is 4325 S. Masten Road, Branch, MI 49402.**
- 2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).**
- 3. The Companies have established a system by which the status of a customer approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that use of CPNI is made until a full review of applicable law has occurred.**
- 4. The Companies train its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Mitchel Bogner, The Companies President. The Companies have an express disciplinary process in place for personnel who make unauthorized use of CPNI.**
- 5. The Companies policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Companies likewise maintains records of its marketing campaigns that use CPNI. The Companies likewise maintains records of its affiliates sales and marketing campaigns that use CPNI. The Companies also maintain records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services**

that was offered as a part of the campaign. The Companies maintain these records in its offices for a minimum of one year.

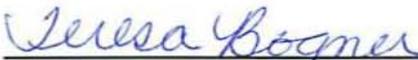
6. The Companies have a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all the rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Mitchel Bogner regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either I or Mitchel Bogner consult the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Companies sales personnel must obtain supervisory approval from either Mitchel Bogner or I regarding any proposed use of CPNI.

7. Further, both Mitchel Bogner and I personally oversee the use of opt-in or opt-out or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI, contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.

8. Mitchel Bogner and I also ensure that the Companies enter into confidentiality agreements, as necessary with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

9. The Companies policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Companies maintain records of customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

Amended:  
September 17, 2008

  
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Teresa Bogner, Secretary