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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: September 17, 2008

Name of company covered by this certification: Mobile Phone of Oklahoma

Form 499 Filer ID: 807147

Name of signatory: Arthur Patrick

Title of signatory: Vice President

I, Arthur Patrick, 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 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 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 in the past year.

The company does not have information with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI

Signed _____

Name: Arthur Patrick
Office: Vice President
Carrier: Mobile Phone of Oklahoma

Company Name ("Carrier"): Mobile Phone of Oklahoma

Address: 5210 NW Oak Ave
Lawton, OK 73505

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 has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- 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: Mobile Phone of Oklahoma does not give out customer information over the phone, nor do we give out customer information to any data collecting entities.

- 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: Mobile Phone of Oklahoma is unaware of any techniques being used by pretexters, but we do have firewalls set up in our customer databases. We also keep all paper copies of customer information in a secure location.

- 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: We have had no customer complaints on any of our employees, nor have we had any complaints against our company.