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September 19, 2008

**Via ECFS**

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

Re: CPNI Certification and Accompanying Statement  
EB Docket No. 06-36

Dear Ms. Dortch:

South Canaan Cellular Communications Company, LP, by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Michael R. Bennet

cc: Telecommunications Consumers Division, Enforcement Bureau  
Best Copy and Printing, Inc.

Attachments

**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 19, 2008**

Name of company covered by this certification: **South Canaan Cellular Communications Company, LP**

Form 499 Filer ID: **821078**

Name of signatory: **Carolyn Copp**

Title of signatory: **President**

I, Carolyn Copp, certify that I am an officer of the general partner of the company named above. Pursuant to Section 64.2009(e) of the FCC's Rules and Regulations, I hereby certify 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) against data brokers in the past year.

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

Signed: Carolyn Copp

Certification of CPNI Filing for Year 2007 filed September 19, 2008

## **ACCOMPANYING STATEMENT OF PROCEDURES**

*Adopted by*

**SOUTH CANAAN CELLULAR COMMUNICATIONS CO., LP.**

*To Ensure Compliance with the Rules and Regulations of*

**THE FEDERAL COMMUNICATIONS COMMISSION**

*Regarding the Protection of*

**CUSTOMER PROPRIETARY NETWORK INFORMATION (“CPNI”)**

Prefatory Statement: South Canaan Cellular Communications Company, LP has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC’s Rules and Regulations. We have adopted the procedures set forth below to ensure our familiarity and compliance with the applicable rules and in the event that we subsequently elect to utilize or provide CPNI for any purpose that requires a Customer’s approval.

### **CPNI Use and Procedures**

- (1) We recognize that we may use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We understand that we may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we understand that we may share the Customer’s CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we may not share the customer’s CPNI with an affiliate without the Customer’s approval.
- (3) We understand that we may use, disclose or permit access to CPNI derived from our provision of local wireless service for the provision of handsets, roaming wireless service, directory assistance, call waiting, call forwarding, three-way calling, caller ID, voice mail, text messaging, mobile messaging, and data services including but not limited to: mobile email, internet, video, instant messaging, and BREW applications (Binary Runtime Environment for Wireless) without Customer approval.
- (4) In the absence of Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of

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service to which the Customer does not already subscribe, except that we understand that we may use, disclose or permit access to CPNI for: (a) handset repair, network repair and maintenance (b) and to market, adjunct-to-basic services such as, but not limited to, handset insurance; roadside assistance; enhanced directory assistance or concierge services; wireless handset tracking services, satellite, and security services.

- (5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a wireless carrier, we do not use CPNI to track Customers that call wireless competitors.
- (6) In two limited circumstances, we utilize third party vendors with access to CPNI to perform essential functions in connection with our provision of telecommunications services: (a) a company that processes call records for the purpose of preparing customer bills, and (b) a company that physically prints the customer bills. In both cases the Company requires these third party vendors to observe the Company's CPNI obligations and to limit their use of CPNI solely to the purpose for which they are permitted access.
- (7) We provide CPNI to law enforcement personnel in compliance with subpoenas, to PSAPs as necessary in emergency situations, and to other carriers for LNP purposes when the customer so authorizes in writing.
- (8) Except as described in the previous two paragraphs, we do not use, disclose or provide access to CPNI to any third parties for any purpose.
- (9) In the event that at a future time we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will obtain approval through written, oral or electronic methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We will honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We will maintain all records of Customer approvals for at least one year. Subject to "opt-out" approval requirements, we understand that we may use a Customer's individually identifiable CPNI to market communications related services to that Customer, and that we may disclose that CPNI to our affiliates that provide communications-related services.
- (10) We will file an annual certification with the FCC regarding our compliance with all CPNI regulations including a report of any actions taken against data brokers in the past year as well as a report of the receipt of any customer complaints regarding the unauthorized release of CPNI during the previous year.