



Saddleback COMMUNICATIONS

A Division of the Salt River Pima Maricopa Indian Community

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: January 26, 2009

Name of company covered by this certification: Saddleback Communications Company

Form 499 Filer ID: 817206

Name of signatory: Bill Bryant

Title of signatory: President and General Manager

I, Bill Bryant, 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) 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 company has 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).

Signed



STATEMENT

Saddleback Communications ("Saddleback") has established operating procedures that ensure compliance with Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Saddleback has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Saddleback educates and trains its employees regarding the appropriate use of CPNI. Saddleback has established disciplinary procedures should an employee violate the CPNI procedures established by Saddleback.
- Saddleback maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Saddleback 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.
- Saddleback has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, Saddleback'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.
- Saddleback took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Saddleback at a state commission, in the court system, or at the Federal Communications Commission: there were no data broker incidents in 2008.
- The following is information Saddleback has with respect to the processes pretexters are using to attempt access to CPNI, and [if any] what steps carriers are taking to protect CPNI: Saddleback used a variety of methods to authenticate customers prior to disclosing CPNI and established passwords for use when discussing Call Detail Records with the customer of record. Saddleback does not use CPNI for marketing purposes.



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- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
 - Number of customer complaints Saddleback received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: NONE
 - Category of complaint:
 - _____ Number of instances of improper access by employees
 - _____ Number of instances of improper disclosure to individuals not authorized to receive the information
 - _____ Number of instances of improper access to online information by individuals not authorized to view the information
 - _____ Number of other instances of improper access or disclosure
 - Description of instances of improper access or disclosure: