BINGHAM

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January 30, 2009

Via Electronic Comment Filing System

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, Suite CY-B402
Washington, DC 20554

Re: ComScape Telecommunications, Inc.
CPNI Certification
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of ComScape Telecommunications, Inc. and each of its direct and indirect subsidiaries, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is its Customer Proprietary Network Information ("CPNI") certification for the 2008 calendar year.

Very truly yours,

Eliot J. Greenwald

Attachment

cc: Best Copy and Printing, Inc. (via e-mail)
Ghanshyam C. Patel

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Hartford
Hong Kong
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Los Angeles
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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 calendar year 2008.

Date filed: 1-21, 2009

Name of company covered by this certification: ComScape Telecommunications, Inc.[1]

Form 499 Filer ID: 822466

Name of signatory: Ghanshyam C. Patel

Title of signatory: President

I, Ghanshyam C. Patel, 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.
If affirmative: Not applicable

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).
If affirmative: Not applicable

Signed _____

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[1] ComScape Telecommunications, Inc. is the indirect parent of licensees ComScape Telecommunications of Jacksonville License, Inc., ComScape Telecommunications of New Bern License, Inc., ComScape Telecommunications of Raleigh-Durham License, Inc., and ComScape Telecommunications of Wilmington License, Inc. and the direct parent of ComScape Telecommunications of Raleigh-Durham, Inc., which is the entity that is engaged in the marketing and provision of commercial mobile radio service for the market areas licensed to the licensees listed herein. The CPNI policy established for ComScape Telecommunications, Inc. applies to each of its direct and indirect subsidiaries.

COMSCAPE TELECOMMUNICATIONS, INC.
STATEMENT OF CPNI COMPLIANCE PROCEDURES

ComScape Telecommunications, Inc. and its subsidiaries ("ComScape") maintain CPNI in the following databases and record systems: billing system, paper vision scanning system and mobile telephone switching office. Each of these systems is protected against unauthorized access by log-in and password procedures. All paper records are shredded prior to disposal.

ComScape has established operating procedures whereby personnel who are authorized to access CPNI are trained in the authorized uses of this information. Pursuant to these procedures, any employee who violates the authorized procedures for access to this information is subject to discipline, up to and including termination of employment.

ComScape has established operating procedures to use an opt-out method of customer consent for the use of CPNI in marketing activities in the event that CPNI is ever used for marketing activities. These procedures include a requirement that the company's database of opt-out approvals be checked before accessing and using the customer's CPNI for marketing in all instances where customer approval is required. Since ComScape does not engage in any marketing activities where customer approval would be required, ComScape does not maintain a database of opt-out approvals at this time.

ComScape does not share CPNI with any joint venture partner or independent contractor. If ComScape were to share CPNI with any joint venture partner or independent contractor, ComScape would first establish an opt-in approval procedure.

ComScape has established operating procedures to maintain a record of all sales and marketing campaigns that use CPNI. Pursuant to these procedures, the records must be maintained by the Marketing Manager and must be maintained for at least one year. At this time, ComScape does not engage in any sales and marketing campaigns that use CPNI.

ComScape has established operating procedures for supervisory review of all outbound marketing activities to ensure compliance with the FCC's rules governing CPNI. Pursuant to these procedures, approval of the Marketing Manager is required prior to any use of CPNI for marketing activities.

ComScape has established operating procedures for account representatives and customer service representatives to access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation, upon oral authorization by the customer. Pursuant to these procedures, each account representative and customer service representative is required to inform the customer of his or her right to deny access to the CPNI before requesting this consent.

ComScape has established procedures to require a password prior to disclosing call detail information or other CPNI to a customer during a customer-initiated call. Similarly, ComScape also has a password requirement for online account access. ComScape will also provide call detail information to a customer by mailing such information to the address of record or calling the telephone number of record upon customer request of if the customer is unable to present a proper password. Lastly, ComScape will provide call detail information to a customer at a retail location upon presentation of a valid photo ID that matches the name on the account.

ComScape has procedures for customer establishment of a password without the use of readily available biographical information or account information. ComScape also has procedures for notifying the customer whenever a password, customer response to a back-up means of notification, online account, or address of record is created or changed.

ComScape has established procedures for notifying the United States Secret Service and the Federal Bureau of Investigation in the event of a breach of CPNI protection within seven days of reasonably determining that there has been a breach. Customer notification shall be delayed for a minimum of seven full business days after notification to the USSS and the FBI. ComScape has established procedures for maintaining records of such breaches for a minimum of two years.

In the event ComScape uses opt-out approval procedures, ComScape has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not

work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) ComScape's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether ComScape has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. ComScape will submit the above letter even if it offers other methods by which its customers may opt-out.