NorthStar Access, L.L.C.
440 Eagle Lake Road N. Box 310
Big Lake, MN 55309

Marlene H. Dortch
Office of the Secretary
Federal Communications Commissions
445 12th Street SW
Washington, DC 20554

Re: EB Docket No. 06-36, Certification of CPNI Filing 2008

Dear Ms Dortch:

This letter serves as our "Certification of CPNI filing 2008", as ordered in EB-06-TC-60.

Company Names(s)	NorthStar Access
Address:	440 Eagle Lake Road North
City/State:	Big Lake MN 55309-0310

As a corporate office of this company, I hereby certify that, based on my personal knowledge, the company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq*. as revised.

The company has not taken any action (proceedings instituted or petitions filed by the Company at state commission, the court system, or the FCC) against data brokers in the past year.

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

The attached Statement demonstrates such compliance.

Company Officer

Dated: 2/3/09

CC:
Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers
Division, Enforcement Bureau, FCC, Room 4-A234, 445 12th Street, SW, Washington, DC 200554
Best Copy and Printing, Inc., Portals, 445 12th Street, SW, Washington, DC 200554

North Star Access

Operating Procedures

Title: Customer Proprietary Network Information (CPNI) Compliance Procedures

Purpose: Ensure the compliance with CPNI rules and regulations and to protect the Customers' CPNI from unauthorized use.

References: FCC Rules, Title 47, Subpart U

Procedure:

A. CPNI Use

(1) We 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 use, disclose or permit access to CPNI to affiliates to provide or market service offerings among the categories of service – local, inter-exchange, information services, CPE – to which Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we 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 do not share the CPNI with an affiliate without the Customer's approval.

(3) Without Customer approval, we do not use, disclose or permit access to CPNI in order to provide or market service offerings within a category of service to which the Customer does not already subscribe, with the following exception: When we are the local service provider we will market and provide the following services: (a) inside wiring installation, maintenance and repair services; (b) service formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

(4) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

(5) CPNI information will be provided to appropriate governmental agencies under force of law.

(6) Customer listing information related to, and for the purpose of directory listings will be provided according to FCC Rules, ensuring appropriate customer safeguards.

(7) Subject to "opt-out" approval requirements, the Customer's individually identifiable CPNI is used to market communications-related services to that Customer, and we may disclose that CPNI to our affiliates that provide communications-related services, our joint ventures, and independent contractors. Any disclosure and access to CPNI by these entities shall be subject to the safeguards under FCC Rules.

B. CPNI Notices

(1) Each Customer is notified in writing of his or her right to restrict the use of disclosure of, and access to, CPNI along with a solicitation of approval. A record of the notifications and the Customers responses, whether oral or written, are maintained for at least one year in the company's information system(s).

(2) The notification provides information on the steps the Customer must take to grant or deny access to CPNI. The notifications contain the following:
   (a) A statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI.
   (b) A description of the types of information that constitute CPNI and the specific entities that will receive CPNI, a description of the purposes for which the CPNI will be used, and the method of informing the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time; a notice that the approval, or disapproval, will remain in effect until the Customer provides notice.
   (c) A statement that new customers need to call to disallow (opt-out-of) the sharing of CPNI within 30 days of receipt of the notice. Waiting period begins on the third day following the date that the notification was mailed.
   (d) A clear statement that a denial of approval will not affect the provision of any services to which the Customer subscribes.
   (e) A statement that the Customer's consent to use their CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs.
   (f) That customer can "opt-out" at any time at no cost to the Customer.

(3) The notifications are clear and not misleading and are of sufficiently large type, and placed in an area readily apparent to the Customer.

(4) The notification is provided to all new customers and to all existing customers at least every 2 years.

(5) We do not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.

(6) Oral notifications are not used except to obtain limited, one-time use of CPNI for inbound and outbound Customer telephone contacts for the duration of a specific phone call. A record of the oral notification and the Customer approval or denial, will be kept for at least one year.

C. CPNI Safeguards

(1) The Company's information system(s) maintains the status of every Customer's CPNI approval, and is referenced prior to the use of the CPNI.

(2) Personnel are trained as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place to deal with employee failures. Any improper use of CPNI will result in disciplinary action in accordance with established Company disciplinary policies.

(3) Customer authentication will be achieved by requiring customers to supply a password to receive call detail records. If the customer is unable to supply the password or refuses to establish a password or be authenticated, the employee may share call detail records and other CPNI by 1) calling the customer back at the telephone number of record; 2) mailing or emailing the CDR to the address (physical or email) of record; 3) confirming the Customer's identity in person with a valid, government issued ID.

(4) A record of sales and marketing campaigns that use Customer's CPNI is maintained and retained for at least one year. 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 part of the campaign.

(6) A supervisory review process ensures compliance with the CPNI rules for outbound marketing situations. Compliance records are maintained for at least one year. Specifically, our sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.

(7) A corporate officer, who acts as agent for the Company, signs and submits a compliance certification on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. Accompanying the Certificate a statement is submitted that explains operating procedures and demonstrates compliance with the CPNI rules.

(8) A written notice will be submitted to the FCC within five business days of any instance where the opt-out mechanisms does not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. That notice would be in the form of a letter and would include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it would be/was implemented, whether relevant state commissions(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. This notice would be submitted even if other methods by which consumers may opt-out were offered.

(9) If we disclose or allow access to Customers' individually identifiable CPNI to independent contractors, we will require, in order to safeguard that information, their entry into confidentiality agreements that: (a) require their use of the CPNI only for the purpose of marketing or providing the communications-related services for which the CPNI has been provided: (b) disallow their permitting any other party to use, allow access to, or disclose the CPNI to any other party, unless they are required to make disclosure under force of law: and (c) require that they have in place appropriate protections to ensure the ongoing confidentiality of the CPNI.

(10) The company will review procedures on a continuing basis to ensure compliance with all FCC regulations, and will revise these procedures as needed to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.