

Received & Inspected

JAN 29 2009

P.O. Box 100, Route 33, Riverton, WV 26814

[skprt@spruceknob.net](mailto:skprt@spruceknob.net), [www.spruceknob.net](http://www.spruceknob.net)



Phone: (304) 567-2121 FCC Mail Room

Fax: (304) 567-2407

January 26, 2009

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW  
Suite TW-A325  
Washington, DC 20554

**Reference: EB Docket No. 06-36, Certification of CPNI Filing of Spruce Knob Seneca Rocks Telephone, Inc.**

Dear Ms. Dortch:

Enclosed is the 2008 CPNI compliance certification for Spruce Knob Seneca Rocks Telephone, Inc. (499 Filer ID 805923) pursuant to amended rule 47 C.F.R. § 64.2009(e).

Please contact me with any questions or concerns.

Sincerely,



Ivan "Sonny" O'Neil  
President

cc: Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

No. of Copies rec'd 0+4  
List ABCDE

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

Received & Inspected

**EB Docket 06-36**

**JAN 29 2009**

FCC Mail Room

Annual 64.2009(e) CPNI Certification for: 2008

Date filed: January 26, 2009

Name of company(s) covered by this certification: Spruce Knob Seneca Rocks Telephone, Inc.

Form 499 Filer ID: 805923

Name of signatory: Ivan "Sonny" O'Neil

Title of signatory: President

I, Ivan "Sonny" O'Neil, 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. This statement also explains what steps the company is taking to protect CPNI.

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 any information with respect to the processes pretexters are using to attempt to access CPNI.

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

Signed Ivan "Sonny" O'Neil

Accompanying Statement  
To 2008 CPNI Annual Certificate  
Spruce Knob Seneca Rocks Telephone, Inc.

Spruce Knob Seneca Rocks Telephone, Inc. ("SKSRT") adheres to all CPNI rules found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations (Sections 64.2001 – 64.2011) concerning the proper use of our customers' CPNI.

SKSRT has established procedures requiring company personnel to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Employees must properly authenticate a customer prior to disclosing CPNI.

SKSRT has implemented a detailed Policies and Procedures Manual on the use, and safeguarding, of CPNI. The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and signed by all company employees. In addition, all current SKSRT employees have been thoroughly trained on the use, and safeguarding, of CPNI and all new employees receive similar training upon hire.

SKSRT uses CPNI for marketing purposes and our customer notices for use of CPNI approval meets all of the requirements contained in the FCC rules, including those specified in Section 64.2008.

To further protect our customer's privacy, we have implemented all of the safeguards contained in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of SKSR Telecom's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

Signed *Dwan "Sonny" O'Neil*