CTS COMMUNICATIONS CORPORORATION

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EB Docket No. 06-36

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W., Suite TW-A325
Washington, D.C. 20554

Dear Secretary Dortch,

In accordance with 47 CFR 64.2009(e), please find attached the Company's Annual Compliance Certificate for the previous calendar year, 2008. The Compliance Certificate includes the Company's:

- Statement explaining how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

If you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Martin F. Feilen

[Martin Feilen]
[Vice President of Sales & Marketing]

Enclosure

cc: Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers Division, 445 12th Street SW, Washington, DC 20554 (2 courtesy copies)

Best Copy and Printing, Inc., FCC@BCPIWEB.COM

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

Including:

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

Explanation of Any Actions Against Data Brokers, and

Summary of all Customer Complaints Received

Martin Feilen signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and 47 CFR 64.2009, on behalf of Climax Telephone Company (Company), related to the previous calendar year, 20 **08**.

This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide:

- A "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

On Behalf Of The Company, I Certify As Follows:

1. I am the Vice President Sales & Marketing of the Company, and therefore an officer of the Company. My business address is 110 N. Main Street, Climax, MI 49034. The Company's Form 499 Filer ID is 808146.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to CPNI.

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

3. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the FCC's regulations governing CPNI, including those adopted on March 13, 2007 in CC Docket No. 96-115.

4. The Company ensures that it is in compliance with the FCC's CPNI regulations. The Company trains its personnel regarding when they are authorized to use CPNI, when they are not authorized to use CPNI, and how to safeguard CPNI. The Company maintains a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for changes in law, including the FCC's most recent changes to its regulations governing CPNI, adopted on March 13, 2007 in CC

Docket No. 96-115. The CPNI Manual contains key all essential information and forms to ensure the Company's compliance with CPNI regulations.

5. The Company has established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

6. Company personnel make no decisions regarding CPNI without first consulting with management.

7. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

8. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

9. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

10. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Company will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

11. The Company maintains records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

12. The Company complies with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters."

13. The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains company personnel accordingly.

Explanation of Actions Against Data Brokers

14. The Company has **not** encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains. [Or: The Company has taken the following actions against data brokers: list case name, docket or case number, and name of data broker.] **NONE**

Summary of all Customer Complaints Received

15. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None. [Or: list number of customer complaints received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category of complaint, e.g., improper access by employees, improper disclosure to individuals not authorized to receive the information, or improper access to online information by individuals not authorized to view the information.] **NONE**

16. The Company does **not** at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI. [Or, explain specific information the company has regarding the processes pretexters are using to attempt to access CPNI, and what steps it is taking to protect CPNI. If the Company has information to provide on this topic, it should submit both redacted and un-redacted versions of this form to the FCC.] **NONE**

Date: 2-6-09 Martin A. Feiler