



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

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 20, 2009

Name of company covered by this certification: Perry-Spencer RTC Inc. (d/b/a PSC) and Perry-Spencer Communications Inc. (d/b/a PSC)

Form 499 Filer ID: 805320 and 818846

Name of Signatory: James M. Dauby

Title of Signatory: President/CEO

I, James M. Dauby, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have 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. The companies do not have any information to report with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The companies have 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

A handwritten signature in blue ink that reads "James M. Dauby". The signature is written over a horizontal line that extends across the page.

PSC

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Statement of Explanation: CPNI Compliance

The operating procedures of Perry-Spencer Rural Telephone Cooperative, Inc. (d/b/a PSC) and of Perry-Spencer Communications (d/b/a PSC) are designed to ensure compliance with the CPNI rules applicable to them (including the new CPNI rules effective December 8, 2007). Such compliance procedures are as follows:

- PSC has designated a CPNI compliance officer and a backup compliance officer for the company. PSC maintains CPNI files, including the tracking of all customer complaints for one year, tracking of CPNI breaches for two years, and all Opt-Out customers. The compliance officer reviews and approves all marketing and sales campaigns and stores copies in the CPNI file. The compliance officer supervises and trains all company employees with access to CPNI.
- PSC trains and certifies all company employees with access to CPNI regarding CPNI requirements.
- PSC only shares call detail records (CDR's) by mailing the CDR to the customers' address of record (of at least 30 days) or in person after confirming the customer's identity with a valid, government-issued ID. PSC authenticates all customers to discuss any non-CDR details on their accounts.
- PSC uses an Opt-Out approach to target market products and services outside the existing customer relationship. PSC sends opt-out notices to all customers every two years. PSC also sends opt-out notices to all new customers. Opt-out status is clearly shown on the customers' accounts.
- PSC has a process in place to notify customers of account changes (address changes, etc.). PSC mails a generic letter to those customers within 48 hours regarding a change being made to their account.
- PSC will notify law enforcement (the FBI and the United States Secret Service) within seven business days after a breach occurs. After the seven days waiting period for law enforcement notification, PSC will notify the customer of any CPNI breach.
- PSC has established disciplinary procedures for employee violations of CPNI rules whether intentional or unintentional.
- PSC will take measures to discover and protect against pretexting and unauthorized disclosures of CPNI. PSC recognizes they have a 'general duty' to protect CPNI and will take measures to protect their customers' CPNI.
- PSC will file an annual certification and statement of CPNI compliance by March 1st each year.

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