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BY ELECTRONIC FILING

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

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 25, 2009

Moore & Liberty Telephone Company	499 Filer ID # 804777
Griggs County Telephone Company	499 Filer ID # 805695

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

cc: Best Copy and Printing, Inc. *via email to fcc@bcpiweb.com*

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MOORE & LIBERTY TELEPHONE COMPANY

P.O. Box 66 Enderlin, ND 58027 (701) 437-3300

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date signed: February 11, 2009

<u>Names of Companies Covered by this Certification:</u>	<u>499 Filer ID</u>
Moore & Liberty Telephone Company	804777
Griggs County Telephone Company	805695

Name of signatory: Tyler Kilde

Title of signatory: Assistant General Manager & Director

I, Tyler Kilde, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") 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 CPNI rules of the Federal Communications Commission ("Commission"). 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 in 2008. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

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

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.



Attachment

MOORE & LIBERTY TELEPHONE COMPANY

Moore & Liberty Telephone Company 499 Filer ID 804777
Griggs County Telephone Company 499 Filer ID 805695

P.O. Box 66 Enderlin, ND 58027 (701) 437-3300

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE February 11, 2009

This statement accompanies the Company's 2008 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining

customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following 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 CPNI.

Not applicable. No actions taken against data-brokers.
 No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.