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February 26, 2009

**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**

**Buggs Island Telephone Cooperative    499 Filer ID # 801312    FRN # 0002031698**

Dear Ms. Dortch:

On behalf of Buggs Island Telephone Cooperative, John Staurulakis (JSI), their consultant is filing the attached 2008 Annual CPNI Certification together with a statement of procedures for operational compliance with FCC's CPNI rules. You may direct any questions regarding the CPNI compliance efforts of Buggs Island Telephone Cooperative to the undersigned.

Sincerely,

A handwritten signature in black ink that reads 'Scott Duncan'.

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
410-693-8290  
[sduncan@jsitel.com](mailto:sduncan@jsitel.com)

Attachment

cc: Best Copy and Printing, Inc. *via email to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)*

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# Bugs Island Telephone Cooperative

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

### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date signed: February 25, 2009

Names of Company Covered by this Certification:

499 Filer ID

Bugs Island Telephone Cooperative

801312

Name of signatory: Mickey L. Sims

Title of signatory: General Manager

I, Mickey L. Sims, certify that I am an officer of Bugs Island Telephone Cooperative ("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 did not take 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 nothing to report respecting processes pretexters use in attempts to gain access to CPNI. 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 and thus has nothing to report respecting customer complaints concerning 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 FCC rules.

Attachment

A handwritten signature in blue ink that reads "Mickey L. Sims". The signature is written over a horizontal line. Below the signature is a large, hand-drawn oval in blue ink.

**BUGGS ISLAND TELEPHONE COOPERATIVE**  
**100 Nellie Jones Road P.O. Box 129, Bracey, VA 23919**

**499 Filer ID 801312**

**2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**February 25, 2009**

This statement serves to explain how Buggs Island Telephone Cooperative ( "Company") is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

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

**1. Uses of CPNI for Marketing**

The Company limits use of CPNI for marketing to the following:

- a. Pursuant to Sections 64.2007(a) and 64.2008(f), the Company uses CPNI, subject to customer authorization, for one-time use during in-bound calls from customers.
- b. Pursuant to Section 64.2005(a), the Company uses CPNI from a category of telecommunications service (local, interexchange or wireless) for marketing limited to use for marketing services in the same category of service from which the CPNI is derived or to another category of telecommunications service to which the customer also subscribes.

**2. 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)).

**3. 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.

**4. 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.

**5. 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.

**6. Customer One-Time Notification and Authorization Process**

The Company has developed procedures for one-time oral notification of customers making inbound calls regarding CPNI pursuant to the requirements of Section 64.2007 generally and Section 64.2007(f) specifically.

**7. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for outbound marketing of services outside a category currently provided to a customer, 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).

**8. Procedures Protecting Against Disclosure of CPNI**

The Company in place procedures for compliance with Section 64.2010 including, but not limited to the following:\*

procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits;

procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

\*The Company does not provide on-line access to customer account information.

**9. 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.

**10. 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).

**11. Supervisory Review Process for Outbound Marketing**

The Company has a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules as well as related record-keeping pursuant to Section 64.2009(c).

**12. 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 record-keeping and deferred notification to customers. During 2008, no such breaches occurred.