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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

Vermont Telephone Company, Inc 499 Filer ID # 809604 FRN # 0005209374

Vtel Wireless, Inc. 499 Filer ID # 817906 FRN # 0003645843

Dear Ms. Dortch:

On behalf of Vermont Telephone Company, Inc. and its affiliate Vtel Wireless, Inc., 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 Vermont Telephone Company, Inc. to the undersigned.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
410-693-8290
sduncan@jsitel.com

Attachment

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

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VERMONT TELEPHONE COMPANY
354 River St., Springfield, VT 05156 (800) 279-4049

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 26, 2009

<u>Name of company (ies) covered by this certification:</u>	<u>499 Filer ID</u>
Vermont Telephone Company, Inc	809604
Vtel Wireless, Inc.	817906

Name of signatory: Michel Guite

Title of signatory: Chairman and Chief Executive Officer

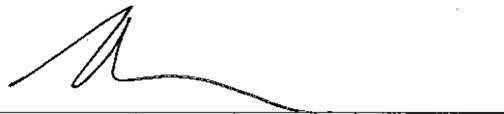
I, Michel Guite, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") and, acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the 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.

The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement. 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. Additionally, 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 not received any customer complaints in the past year concerning the unauthorized release of CPNI and thus has nothing to report respecting pretexters use in attempts to gain access to 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

VERMONT TELEPHONE COMPANY

Vermont Telephone Company, Inc. 499 Filer ID 809604
Vtel Wireless, Inc. 499 Filer ID 817906

354 River St., Springfield, VT 05156 (800) 279-4049

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE February 26, 2009

This statement serves to explain how Vermont Telephone Company and Vtel Wireless, Inc. (collectively and individually "Company"), are 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 indicated otherwise.

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 has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes 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 established procedures appropriate 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;

procedures and processes to control customer access to on-line account information in compliance with Section 64.2010(c), comprising authentication through a password established in compliance with Section 64.2010(e) together with password back-up authentication procedures in compliance with Section 64.2010(e); and

implementation of 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

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

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. During 2008, no such breaches occurred.