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February 27, 2009

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

RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2008
Form 499 Filer ID 802371

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification for Northeast Telephone Company. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Please contact me at 920-617-7175 or larry.lueck@nsight.com if you have any questions about this filing.

Sincerely,

Larry L. Lueck
Manager of Government Relations

cc: Telecommunications Consumers Division, Enforcement Bureau (2 copies, by U.S. mail)
Best Copy and Printing, Inc. (via e-mail)

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

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company(s): Northeast Telephone Company, a division of Northeast Communications of Wisconsin, Inc. d/b/a Nsight Telservices

Form 499 Filer ID covered by this certification: 802371

Name of signing officer: Roger Hermsen

Title of signatory: Vice President & Chief Operating Officer of Fixed Operations

CERTIFICATION

I, Roger Hermsen, hereby certify that I am an officer of the company(s) named above, 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 Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq*. of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq*. of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.

Name: Roger Hermsen
Title: Vice President & Chief Operating Officer of Fixed Operations
Date: February 27, 2009

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier had no issues with data brokers in 2008, therefore no action was required.
- Carrier has no new or additional information with respect to the processes pretexters are using to attempt to access CPNI. Carrier's current CPNI procedures are designed to protect against pretexters.
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
    - Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0 (zero)