



2600 Maitland Center Pkwy.  
Suite 300  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL  
32790-0200  
Tel: 407-740-8575  
Fax: 407-740-0613  
www.tminc.com

February 27, 2009  
Via ECFS

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

**RE: EB Docket No. 06-36**  
**Annual 64.2009(e) CPNI Certification for 2008**  
**BullsEye Telecom, Inc. - Form 499 Filer ID 822214**  
**And**  
**BullsEye Telecom of Virginia, LLC - Form 499 Filer ID 826241**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC. 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.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to  
BullsEye Telecom, Inc. and  
BullsEye Telecom of Virginia, LLC

Attachments

*MB/sp*

cc: FCC Enforcement Bureau (2 copies)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
D. Bailey - BullsEye  
file: BullsEye - CPNI  
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008  
Date Filed: February 27, 2009  
Name of Company covered by this certification: **BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**  
Form 499 Filer ID: 822214  
And  
8826241  
Name of Signatory: Peter LaRose  
Title of Signatory: Vice President - Finance

I, Peter LaRose, certify and state that:

1. I am the Vice President-Finance of BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC (collectively known as "BullsEye") 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. Section 64.2001 *et seq.*
2. 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.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Peter LaRose, Vice President - Finance  
BullsEye Telecom, Inc.  
BullsEye Telecom of Virginia, LLC

Date

2/26/09

Attachment A  
Statement of CPNI Procedures and Compliance

**BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**

Calendar Year 2008

**BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC, its Virginia operating subsidiary, (collectively known as “BullsEye” or “Company”) provides local exchange and long distance services to business customers. Both companies use the same procedures for all aspects of operations. The Company provides the following as its Statement of CPNI compliance.

The Company uses CPNI, upon occasion, to market services to its customers. It notifies its customers of their right to restrict use of, disclosure, and access to their CPNI through opt-out notifications, and as part of the Company-customer Master Service Agreement. The Company maintains records establishing that notice was provided and whether or not the customer’s approval was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI. Prior to marketing to existing customers, the Company filters the list of contacts using a system flag that indicates whether a customer has opted-out of marketing activity. Marketing campaigns to educate customers on events related to their existing services or to make them aware of new services are done under the supervision of senior staff who specify the customer lists to be used and how the customers on the list are to be approached. All marketing and sales contact campaigns are measured and tracked and the records are maintained within the Company for a minimum of one year.

BullsEye bills its customers directly and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The company has put into place processes to safeguard its customers’ CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

Customer contact personnel have been briefed regarding CPNI, including the confidentiality of call detail records, and Company policy not to use, access, release, disclose or destroy customer information in any unauthorized manner.

**BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**  
(Page 2)

Call detail information is provided over the telephone to customers. Customers define an account User Name and Password at the time the customer account is established. In addition, each Customer must select a secret question and answer upon establishment of an account. Should a customer forget or lose the password, such information can be provided to the customer at the email address established when the account was set up. If the customer cannot provide the correct password or response to any back-up authentication methods the Company requires that a new password be established. If the customer cannot provide the password or backup authentication question response, and the customer question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by mail to the customer's address of record, or by calling the customer at the telephone number of records.

The Company has procedures to maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

For on-line account access, BullsEye's authentication and password procedures are in compliance with the applicable rules set forth in 47 C.F.R. Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information. BullsEye maintains customer privacy and data security in private access/log-in applications by issuing unique, random IDs in addition to allowing customers to select their own unique passwords. By combining a random ID along with a customer-selected password, the company has eliminated the risk of log-in information being decrypted with known factors or personal information by unauthorized users. This security strategy is used on all BullsEye on-line private access systems.

**BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**  
(Page 3)

The Company does not have retail locations and therefore does not disclose CPNI in-store.

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information): password changes, change in a response to a back-up means of authentication, change to an on-line account, or change or creation of an address of record other than at service initiation.

The Company has not taken any actions against data brokers in the last year.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the United States Secret Service and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.