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February 27, 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: AMENDED CERTIFICATION OF CPNI COMPLIANCE FILING**

Names of Companies Covered by the Certification:	499 Filer ID	FRN
Planters Rural Telephone Cooperative, Inc.	801192	0004306825
Planters Long Distance, Inc.	820606	0004321253
Planters Net, Inc.	820222	0004306171
Planters Communications, LLC	Pending	0017068073

Dear Ms. Dortch:

On behalf of Planters Rural Telephone Cooperative, Inc. and its affiliates, listed above, John Staurulakis (JSI), their consultant is filing the attached Amended 2008 Annual CPNI Certification together with an amended statement of procedures for operational compliance with FCC's CPNI rules. The amendments to the original filings made on February 11, 2009, serve to add Planters Net, Inc. and Planters Communications, LLC to the affiliates covered by the CPNI certification. You may direct any questions regarding the CPNI compliance efforts of Planters Rural Telephone Cooperative, Inc. and its affiliates to the undersigned.

Sincerely,

Scott Duncan  
JSI Staff Director-Regulatory Affairs  
301-459-7590  
[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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**PLANTERS RURAL TELEPHONE COOPERATIVE, INC.**

P. O. Box 8 Newington, GA 30446 912-857-4411

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

**EB Docket 06-36**

**AMENDED ANNUAL 64.2009(E) CPNI CERTIFICATION FOR 2008<sup>1</sup>**

Date signed: February 27, 2009

<u>Names of Companies Covered by this Certification:</u>	<u>499 Filer ID</u>	<u>FRN</u>
Planters Rural Telephone Cooperative, Inc.	801192	0004306825
Planters Long Distance, Inc.	820606	0004321253
Planters Net, Inc.	820222	0004306171
Planters Communications, LLC	Pending	0017068073

Name of signatory: Stephen Milner

Title of signatory: General Manager

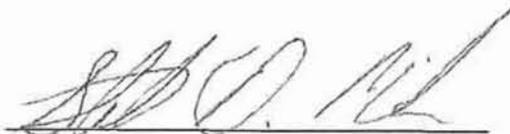
I, Stephen Milner, certify that I am an officer of the affiliated companies named above (collectively and individually "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the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

<sup>1</sup> Planters Rural Telephone Cooperative, Inc. ("PRTC") is amending its 2008 Annual CPNI Certification ("Certification") to add affiliates Planters Net, Inc. ("PNI") and Planters Communications, LLC ("PCLLC") to the original filing via ECFS on February 11, 2009. Although PNI has a 499 Filer ID, PNI provides Internet services and has not provided telecommunications services in recent years and thus has not filed FCC Form 499. PCLLC is a nascent CLEC that did not operate in 2008. PRTC makes these additions for the convenience in monitoring by both itself and the Enforcement Bureau.

**PLANTERS RURAL TELEPHONE COOPERATIVE, INC.**  
**P. O. Box 8 Newington, GA 30446 912-857-4411**

<u>Companies Covered by the Procedures Summarized Herein:</u>	<u>499 Filer ID</u>	<u>FRN</u>
Planters Rural Telephone Cooperative, Inc.	801192	0004306825
Planters Long Distance, Inc.	820606	0004321253
Planters Net, Inc.	820222	0004306171
Planters Communications, LLC	Pending	0017068073

**AMENDED 2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE<sup>1</sup>**  
**February 27, 2009**

This statement accompanies the 2008 Customer Proprietary Network Information (“CPNI”) Certification for Planters Rural Telephone Cooperative, Inc. and its affiliates Planters Long Distance, Inc., Planters Net, Inc. and Planters Communications, LLC (collectively and individually “Company”), 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.*

**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.

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<sup>1</sup> Planters Rural Telephone Cooperative, Inc. (“PRTC”) is amending its 2008 Annual CPNI Certification –Accompanying Statement of CPNI Rule Compliance to add affiliates Planters Net, Inc. (“PNI”) and Planters Communications, LLC (“PCLLC”) to the original filing via ECFS on February 11, 2009. Although PNI has a 499 Filer ID, PNI provides Internet services and has not provided telecommunications services in recent years and thus has not filed FCC Form 499. PCLLC is a nascent CLEC that did not operate in 2008. PRTC makes these additions for the convenience in monitoring by both itself and the Enforcement Bureau. Access to CPNI for all of PRTC’s operations, including affiliates, is controlled by Company-wide integrated CPNI safeguards.

**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 in place procedures for compliance with Section 64.2010 including, but not limited to the procedures listed below:

The Company has implemented procedures for 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**

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.