



March 2, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington DC, 20554

RE: STSJ Overseas Telephone Company, Inc. CPNI Compliance Certifications EB
Docket # 06-36

Dear Ms. Dortch:

On behalf of STSJ Overseas Telephone Company, Inc. and pursuant to 47 C.F.R. Section
64. 2009 (e), enclosed is the Companies 2008 CPNI Certification.

Very yours truly,

A handwritten signature in black ink that reads "Theresa Walker". The signature is written in a cursive, flowing style.

Theresa A. Walker

Enclosures

cc: Enforcement Bureau Telecommunications Consumer Division (2 copies)
Best Copy and Printing, Inc. (via email)

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

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 2, 2009

Name of company covered by this certification: STSJ Overseas Telephone Company, Inc.

Form 499 Filer ID: 808678

Name of signatory: Thomas R. Kloster

Title of signatory: Chief Financial Officer

I, Thomas R. Kloster certify that I am an officer of the company 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 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 not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

SIGNED



**THOMAS R. KLOSTER
CHIEF FINANCIAL OFFICER**

CERTIFICATION OF CPNI FILING
FEBRUARY 27, 2009
EB Docket No. 06-36; EB-06-TC-060

Statement of CPNI Procedures and Compliance

STJSJ Overseas Telephone Company, Inc. ("STJSJ") does not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes. If STJSJ elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. STJSJ will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes.

Consistent with the Commission's rules, STJSJ uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of STJSJ, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

STJSJ does not currently market to customers that call and make inquiries concerning their account information. But should the Company choose to do so in the future, it will obtain a customer's oral authorization. STJSJ will also require each representative to provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

STJSJ has implemented procedures whereby it will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer's identity prior to disclosing CPNI, STJSJ authenticates the customer using a variety of methods. STJSJ has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant rules.

STJSJ has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, STJSJ will notify affected customers. STJSJ will maintain a record of any CPNI-related breaches for a period of at least two years.

All STJSJ employees who have access to CPNI receive training about CPNI compliance. Specifically, a summary of STJSJ CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All STJSJ employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by STJSJ. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.