

BoaGroup, LLC d/b/a BoonLink Communications
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May 4, 2009

SUBMITTED ELECTRONICALLY VIA ECFS

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

Re: Annual 64.2009(e) CPNI Certification for 2008
Original Date filed: March 2, 2009
EB Docket No.: 06-36

Dear Ms. Dortch:

The instant filing is a supplement to Boonlink Communications' March 2, 2009 CPNI Certification for 2008. This filing is made to provide the Form 499 Filer ID which had not been assigned at the time of the initial submission. A copy of the March 2, 2009 CPNI Certification is attached for the convenience of FCC staff.

The Form 499 Filer ID is 827676.

Please contact me if there are any questions about this submission.

Respectfully submitted,



John McDowell, Owner
BoaGroup, LLC d/b/a BoonLink Communications

Enclosures

cc: FCC Enforcement Bureau, Telecommunications Consumers Division (via hand delivery)
Best Copy and Printing, Inc. (via email FCC@BCPIWEB.COM)



The FCC Acknowledges Receipt of Comments From ...
BoaGroup, LLC dba Boonlink
...and Thank You for Your Comments

Your Confirmation Number is: '200932569326 '	
Date Received:	Mar 2 2009
Docket:	06-36
Number of Files Transmitted: 1	

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updated 12/11/03

Annual 47 C.F.R. § 64.2009(e) CPNI CertificationEB Docket 06-36

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

Annual 64.2009(e) CPNI Certification for 2008
Date filed: March 2, 2009

Name of company covered by this certification: BosGroup, LLC dba Boonlink

Form 499 Filer ID: New filer; certification will be supplemented once Form 499 Filer ID is issued.

Name of signatory: John McDowell

Title of signatory: Owner

I, John McDowell, 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 (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed:



John McDowell

cc: FCC Enforcement Bureau, Telecommunications Consumers Division (via hand delivery)
Best Copy and Printing, Inc. (via email FCC@BCPTWEB.COM)

CUSTOMER INFORMATION POLICY

To protect the proprietary and private information about our customers, Boonlink Communications has established this company policy regarding customer information:

1. The company protects, with passwords, all of the company's proprietary data bases, including those containing customer information. Only authorized personnel may access such data bases, and passwords are distributed only to those authorized personnel. Passwords will be changed routinely and whenever an employee with access to such data bases leaves the company.
2. Employees and others are prohibited from removing customer information in any form from the company's offices. This includes computer printouts, handwritten information or notes, photocopies of files or documents or copies in any electronic form, and verbal transmission of customer information to persons who are not direct employees.
3. Employees are to closely guard customer lists, contact information, telephone numbers and all other customer information, both proprietary and public, to prevent accidental or intentional removal of any information from our offices by non-employees. Employees are required to protect all such information with passwords.
4. Notes that a salesperson may make about a customer must be returned to the company's office and re-filed, scanned into a secure password-protected system or shredded. This information is to be shared only with the customer. At the completion of the sales call, the information is to be returned to the office and re-filed, scanned into a secure password-protected system or shredded.
5. Internal documents, notes of calls from customers, and anything containing customer names and telephone numbers must be filed, scanned into a secure password-protected system or shredded at the end of each business day.
6. Each new customer is asked to select a personal password and to provide the company with certain information that only the customer knows, which password and information is to be used for identification purposes. Customers must confirm his/her identity by providing his/her pre-existing password and pre-selected information before the company will discuss any matter with the customer.
7. Customer information is never to be used or disclosed to anyone without the customer's affirmative opt-in consent consistent with FCC rules, except as follows:
 - (a) to market the company's service offerings to which the customer already subscribes;
 - (b) to market the company's CPE, information services, and adjunct-to-basic services;
 - (c) to protect the company's own rights and property, and to protect the rights of other carriers or other users of services from fraudulent, abusive or unlawful use;
 - (d) to comply with the company's obligations to provide certain customer information when lawfully requested by law enforcement authorities pursuant to the Communications Assistance for Law Enforcement Act ("CALEA"); and
 - (e) to resolve specific customer questions about the customer's own account arising in the course of a telephone conversation between that customer and company's service

representative, and then only after orally obtaining from the customer a limited, one-time authorization to use the customer's information for the duration of that phone call.

8. Disconnected or inactive customer files are to be retained for no more than three (3) years, and then shredded. Disconnected or inactive customer files are never to be placed in the trash unshredded. Customer database printouts are to be shredded when replaced by newer printouts.
9. Appropriate disciplinary action will be taken for any violations of this policy.