



**Buckeye CableSystem**

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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Ste TW-A235  
Washington, DC 20544

**RE: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: Jan. 22, 2010

Name of company(s) covered by this certification: Buckeye Cablevision, Inc.

Form 499 Filer ID: NA

Name of signatory: W.H. "Chip" Carstensen

Title of signatory: President and General Manager

I, W.H. "Chip" Carstensen, 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 received one complaint involving the release of CPNI in 2009, and duly reported the incident (reference number 2009 – 1033438) pursuant to Commission rules. The incident occurred on June 17, 2009 when a caller to Buckeye's customer service department claimed that she was with customer's elderly mother who needed to get in touch with customer immediately but that the number had been disconnected. The customer service representative ("CSR") explained that the number they were trying was incorrect, that it had been recently changed, that the name on the account had been changed from customer's husband to customer's name and also gave the caller the customer's new unpublished number. Contrary to Buckeye established procedures, the CSR did not ask for the password to the account before giving out the information. The CSR then contacted customer to tell her that her mother was trying to contact her. Customer confirmed that the call had been placed on her mother's behalf. Appropriate disciplinary action was taken against the CSR. Company was subsequently notified by the Administrator for CPNI reporting that the report had been reviewed by law enforcement and that no further action would be taken.

Received & Inspected  
JAN 25 2010  
FCC Mail Room

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

Signed Walter Kasten

Copy: Best Printing

EXHIBIT A  
Buckeye Cablevision, Inc.

These policies and procedures, which are briefly summarized below, ensure compliance by limiting access to, use of, and disclosure of CPNI.

Only authorized personnel can access CPNI. All personnel so authorized, such as customer service representatives and billing and collection personnel, are trained in the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.

The Company does not share CPNI among its affiliates other than in direct support of its business, unless prior customer approval has been obtained or no customer approval is needed. Further, the Company requires all independent contractors who have access to CPNI to enter an appropriate confidentiality agreement and to abide by applicable laws, regulations, policies, and procedures. The Company does not disclose CPNI to other third parties except as requested by the customer or as compelled or authorized by law.

The Company has always and will always require the customer to choose a password when establishing a service account.

The Company notifies customers of their right to restrict access to, use of, and disclosure of their CPNI annually through bill inserts. The Company maintains records of all customer requests to opt-out of any communication or related disclosure for all communication other than in direct support of the Company's business.

All out-bound marketing campaigns that utilize CPNI are subject to managerial approval and to verification of customer approval to use CPNI in this manner. Records related to such efforts are maintained for at least one year.

Managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness. The Company will report to the Commission instances, if any, in which opt-out mechanisms do not work properly.