

February 10, 2010

**BY ELECTRONIC FILING**

Marlene H. Dortch  
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 47 C.F.R §64.2009(E) CPNI Certification  
Filed in the year 2010 covering the prior calendar year 2009  
Mashell Telecom, Inc. d/b/a Rainier Connect  
FCC Form 499 Filer ID: 803703

To Whom It May Concern:

Attached is Mashell Telecom, Inc. d/b/a Rainier Connect's CPNI Certification for the year 2010 covering the prior year 2009 as instructed in Public Notice DA 10-91.

Our certification will be filed electronically in the ECFS system.

Please contact me if you have any questions or concerns regarding this filing.

Sincerely,



Mark Carrier  
Regulatory & Compliance Manager  
Mashell Telecom, Inc. d/b/a Rainier Connect  
PO Box 683  
Centralia, WA 98531  
360-623-4555 - Direct  
360-388-6392 - Cell  
360-623-1115 - Fax  
[mark.carrier@rainierconnect.net](mailto:mark.carrier@rainierconnect.net)

cc: Best Copy and Printing, Inc. *via email to* [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

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

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: 2/10/10
2. Name of company covered by this certification: Mashell Telecom, Inc. d/b/a Rainier Connect
3. Form 499 Filer ID: 803703
4. Name of signatory: Brian Haynes
5. Title of signatory: President / CEO
6. Certification:

I, Brian Haynes, 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, 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.

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

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
[Signature of an officer, as agent of the carrier]

### Attachments:

1. Accompanying Statement explaining CPNI procedures
2. Explanation of actions taken against data brokers (if applicable) (N/A)
3. Summary of customer complaints (if applicable) (N/A)

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION RULES**

Mark Carrier signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 §64.2009, on behalf of Mashell Telecom, Inc. d/b/a Rainier Connect. This Certificate of Compliance addresses the requirement of FCC's (CFR) Title 47 §64.2009 that the Company provide both a Certificate of Compliance and a statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 §64.2001-2011.

On behalf of the Company, I certify as follows:

1. I am the Regulatory & Compliance Manager of the Company.

My business address is:

1417 Kresky Ave. #1, PO Box 683.  
Centralia, WA 98531

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself, Customer Service Managers, Kelly Wienholz or Amanda Singleton or Marketing & Commercial Sales Manager, Debbie Reding. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.

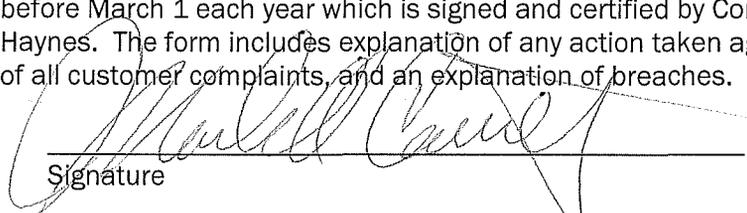
**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION RULES (Cont'd)**

8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with Customer Service Managers, Kelly Wienholz or Amanda Singleton, Marketing & Commercial Sales Manager, Debbie Reding or me regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, Regulatory & Compliance Manager, Mark Carrier, Customer Service Managers, Kelly Wienholz or Amanda Singleton, Marketing & Commercial Sales Manager, Debbie Reding or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from Customer Service Managers, Kelly Wienholz or Amanda Singleton, Marketing & Commercial Sales Manager, Debbie Reding or me regarding any proposed use of CPNI.

9. Further, Customer Service Managers, Kelly Wienholz or Amanda Singleton, Marketing & Commercial Sales Manager, Debbie Reding, or I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. We also review all notices required by the FCC regulations for compliance therewith.

10. Customer Service Managers, Kelly Wienholz or Amanda Singleton, Marketing & Commercial Sales Manager, Debbie Reding, or I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

11. I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year which is signed and certified by Company President & CEO, Brian Haynes. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.

  
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Signature

Mashell Telecom, Inc. d/b/a Rainier Connect  
Company

2/10/10  
Date