

# **RUDDATA CORPORATION** dba VCI Internet Services

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523 S 3<sup>RD</sup> ST  
PADUCAH, KY 42003

TELEPHONE: 270-442-0060  
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February 24, 2010

*Via: ECFS Transmission*

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

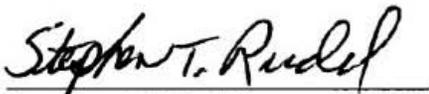
**Reference: EB-Docket No. 06-36**  
**Certification of CPNI Compliance of Ruddata Corporation – Filer Id 825851**

Dear Ms. Dortch:

Enclosed is the 2009 CPNI compliance certificate of Ruddata Corporation for calendar year 2009 along with an accompanying statement of operating procedures as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Sincerely,



Stephen T. Rudd  
President

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

Annual 64.2009(e) CPNI Certification due March 1, 2010 covering the prior calendar year 2009

1. Date filed: 02/24/2010
2. Name of company covered by this certification: Ruddata Corporation
3. 499 Filer ID: 825851
4. Name of signatory: Stephen T. Rudd
5. Title of signatory: President
6. Certification

I, Stephen T. Rudd, 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 Ruddata 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 Ruddata'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.

Ruddata has not taken any 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 in the past year.

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

Ruddata 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 be subject to enforcement action.

Signed Stephen T. Rudd, President

Attachments: Accompanying Statement of CPNI Procedures

Ruddata Corporation  
Statement of Procedure  
Customer Proprietary Network Information  
Last Updated: February 24, 2010

Ruddata Corporation is a small CLEC. Two key employees, the company president and office manager, write and maintain the computer code used for call record processing, customer billing, and accounting functions. These are the only two employees who have a thorough understanding and complete access to the computer programs and data, including all call detail records, used to store and process subscriber information. Long Distance (toll) call records are provided to the network administrator who is responsible for the web server and scripts used to provide online access to toll call records. Toll records are accessible to subscribers who have requested this service. Access is password protected and letters are mailed to the address on file for subscribers upon the initial request for online access and anytime online passwords are changed.

All other employees have access only to basic subscriber information needed to handle customer service and technical support calls. Billing that includes long distance charges is prepared for mailing by Ruddata staff. This does present an opportunity for viewing long distance detail, however, employees are closely monitored during this time by the office manager to ensure these bills are not being compromised.

Ruddata did not utilize any marketing companies or programs in 2009 and did very little advertising due to the weak economy. Ruddata has never analyzed CPNI, including call detail records, for the purpose of marketing telecom services to existing or potential subscribers. Subscriber information including CPNI is not provided to or sold to third parties including data brokers. We believe the distribution of such information would be the equivalent of providing our competitors' with our customer list. There are only 3 times employees are authorized to disclose any subscriber information to anyone other than the subscriber.

1. When required by law to submit information to satisfy a subpoena from a law enforcement agency.
2. When orders are placed for access loops with third party access providers such as our LEC, AT&T, or our local power company whom provides us with Fiber Optic access for telephone and Internet Services.
3. When utilizing an established local mailing company with automated equipment to prepare the majority of Ruddata billing for mailing. Bills with call details are not sent to the mailing company.

All computer servers used in the processing and storage of subscriber information including CPNI are password protected and are located on a private network located behind a firewall for additional protection from public intrusion. All access to these servers, including physical access, is limited to employees who need access to complete their job function.

When signing up for service, subscribers must provide either the last 4 digits of their Social Security Number or their Driver's License Number. The subscriber is informed that we require this information to confirm their identity anytime they request information regarding their account. Subscribers are also given an opportunity to authorize additional contacts with whom we may discuss their account and provide account details.

Employees are continually trained and reminded to provide account details only to a subscriber or authorized party who is able to provide us with the last 4 digits of the subscriber's social security number or drivers license number. Employees are made aware that improper disclosure of account information may result in termination of employment. Annual training sessions are conducted to refresh employees with all Ruddata policies and procedures including CPNI procedures.