

Scott C. Obert-Thorn, CPA  
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2/25/2010

By Electronic Filing

Marlene H. Dortch, Secretary  
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  
Certification of CPNI Compliance Filing**

Dear Ms. Dortch:

On behalf of Valley Cable TV, Inc., FCC Form 499 Filer ID 827997, attached is the annual CPNI Certification filing together with the Statement of FCC CPNI Rule Compliance.

Sincerely,

  
Scott C. Obert-Thorn  
Valley Cable TV, Inc.

Attachment

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: 2/25/2010
2. Name of company covered by this certification: Valley Cable TV, Inc.
3. Form 499 Filer ID: 827997
4. Name of signatory: Scott C. Obert-Thorn
5. Title of signatory: Chief Financial Officer
6. Certification:

I, Scott C. Obert-Thorn, 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



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Scott C. Obert-Thorn  
Chief Financial Officer  
Valley Cable TV, Inc.

**Attachments:**      Accompanying Statement explaining CPNI procedures

## **ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE**

### **Statement Regarding CPNI Operating Procedures**

Valley Cable' written CPNI Operating Procedures ensure that Valley Cable will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Valley Cable' CPNI Operating Procedures are:

- A requirement that Valley Cable have at all times a CPNI Compliance Supervisor to supervise the implementation of Valley Cable' CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

Valley Cable does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. If Valley Cable later decides to allow such access it will first comply with all requirements regarding customer approval, including opt-in and opt-out, and will impose appropriate safeguards to assure that all regulatory requirements are met both through listings in billing system records for customers' accounts and a requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns