SCRTC Total Communications

South Central Rural Telephone
Cooperative Corporation, Inc.

January 28, 2011

Via ECFS

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

RE: CPNI Certification and Statement Filing

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's Rules, I hereby submit the attached annual Customer Proprietary Network Information Certificate and accompanying statement on behalf of South Central Rural Telephone Cooperative.

Should you have any questions or need further information, please contact me.

Sincerely,

Donnie C Bennett

Donnie Bennett, Regulatory Manager

cc: (2) copies, US mail to Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers Division, 445 12th Street, SW, Washington, DC 20554
Best Copy and Printing, Inc. via email to FCC@BCPIWEB.COM

P.O. Box 159 • Glasgow, Kentucky 42142-0159
(270) 678-2111 or (270) 528-2361 • fax (270) 678-3030 • www.scrtc.com

SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE CORPERATION, Inc.

P. O. Box 159 Glasgow, KY 42142-0159 270-678-2111

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

EB-06-TC-060

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2010**

Date filed: **January 28, 2011**

Name of companies covered by this certification:

South Central Rural Telephone Coop. Corp., Inc Form 499 Filer ID: **802179**

South Central Telcom, LLC Form 499 Filer ID: **822582**

Name of signatory: Charles Knight

Title of signatory: Chairman of Board of Directors

I, Charles Knight, certify that I am an officer of the affiliated companies named above (collectively and individually "Company"), 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 in the year of or related to the year of 2010. The Company is not aware of any attempts by pretexters to access Company customers CPNI which would warrant any action to be taken. The Company has procedures in place to protect CPNI from unauthorized access as described in the accompanying statement.

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

Signed Charles Knight

SOUTH CENTRAL RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

South Central Rural Telephone Coop. Corp., Inc. 499 Filer ID 802179
South Central Telcom, LLC 499 Filer ID 822582

P. 0. Box 159 Glasgow, KY 42142-0159

2008 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
January 28, 2011

This statement serves to explain how South Central Rural Telephone Cooperative Corporation, Inc. and its affiliated telecommunications carrier listed above (collectively and individually "Company") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Our Use of CPNI in Marketing

The Company does not use CPNI for marketing purposes except in the following circumstances:

i. to market services to our existing customers within the categories of service to which the customer already subscribes.

ii. to market "adjunct-to-basic"

iii. to provide CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

For marketing purposes for which use of CPNI would otherwise require permission from the customers, the Company uses only customer billing name and address and/or telephone number without any segregation or refinement based on CPNI. On inbound and administrative calls, however, the Company may utilize CPNI in its sales and marketing efforts by first requesting permission to do so pursuant to §64.2008(f). In those cases, the Company recognizes that permission to use CPNI ends when the call terminates and the customer is fully informed that he may refuse the permission.

We regularly review our marketing practices to determine when, how and if CPNI is used within the Company to insure that we remain in compliance with the FCC's CPNI regulations and with our policy as described here in. In the unlikely event that Company decides to modify its policies for use of CPNI, it will insure that its new policy fully complies with FCC CPNI rules including, but not limited to, tracking and customer notice provisions contained in §64.2008-2009.

7. Procedures Protecting Against Disclosure of CPNI

The Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company does not provide on-line access to customer account information at this time. If the Company develops on-line access in the future, procedures will be implemented to control access in compliance with Section 64.20101(c) comprising authentication through a password established in compliance with Section 64.20l0(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable — No actions taken against data-brokers.
No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.