February 7, 2011

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Texas RSA 1 Limited Partnership d/b/a XIT Wireless (499 Filer ID # 808014), please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

Jean Langkop
Authorized Representative of
Texas RSA 1 Limited Partnership d/b/a XIT Wireless

JL/pjf

Attachments

cc: Best Copy and Printing, Inc (via email FCC@BCPIWEB.COM)
Mr. Darrell F. Dennis, Texas RSA 1 Limited Partnership d/b/a XIT Wireless
Ms. Sandy Reynolds, Texas RSA 1 Limited Partnership d/b/a XIT Wireless

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date: February 4, 2011

Name of company covered by this certification: Texas RSA 1 Limited Partnership d/b/a XIT Wireless

Form 499 Filer ID: 808014

Name of signatory: Darrell F. Dennis

Title of signatory: General Manager

I, Darrell F. Dennis, 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 (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 is not aware of any attempts by pretexters to access the CPNI of Company customers and has not had to take any actions against data brokers.

The Company has not received any customer complaints in the past year (2010) 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 Darrell F. Dennis

Attachment: Accompanying Statement of Compliance explaining CPNI procedures

TEXAS RSA 1, LIMITED PARTNERSHIP D/B/A XIT WIRELESS
STATEMENT OF COMPLIANCE WITH THE FCC'S CPNI RULES

Pursuant to Section 64.2009(e) of the FCC's rules, this statement explains how Texas RSA 1, Limited Partnership d/b/a XIT Wireless' operating procedures ensure compliance with Part 64, Subpart U of the FCC rules on CPNI and its requirements for the safeguarding of such customer information.

The Company's CPNI Policy and Procedures manual describes what CPNI is, when it may be used without customer approval, and when customer approval is required. Disclosure of, or permitting access to customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011. The Company has chosen to prohibit the use of CPNI for marketing purposes by itself and between its affiliates. If customers' CPNI is to be used for sales and marketing campaigns in the future, the required notification will be provided to customers, approval obtained as required, and appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.

The Company has internal procedures in place to educate employees about CPNI and the disclosure of CPNI. Employees with access to this information have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy and Procedures Manual describes the disciplinary process for noncompliance with CPNI rules, including possible termination.

The Company has designated a Director for CPNI Compliance who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010, including, but not limited to the following: Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls or business office visits. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords has been implemented. Passwords and back-up authentication questions are established in accordance with § 64.2010(e). For new customers, passwords and responses to back-up security questions are determined when the customer places an order to establish service. For existing customers to establish a password, the Company must first authenticate the customer without the use of readily available biographical or account information. This could be accomplished by calling the customer at the telephone number of record or reviewing a valid, photo ID if the customer comes to the business office.

Call detail information is only disclosed over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the Company asking for readily available biographical information or account information. If a customer does not provide a password, the Company only discloses call-detail information by sending it to the address of record or by calling the customer at the telephone number of record. Call detail information may be discussed if the customer is able to provide call detail information without the Company's assistance.

At the present time customers do not have online access to their accounts. If in the future, on-line access to account information will become available, the Company's on-line system will be designed to protect customers' CPNI from unauthorized access in accordance with § 64.2010(c) of the Commission's rules.

The Company has implemented procedures to notify customers immediately whenever a password, back-up means of authentication or address of record is created or changed.

The Company complies with the FCC's rules regarding the notification of law enforcement and customers, in the event of a CPNI breach. The Company maintains a record for at least two years of any breaches discovered, notifications made to law enforcement (i.e., United States Secret Service and the Federal Bureau of Investigation) and customers, and responses from law enforcement.