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February 17, 2011

(Via ECFS)
Marlene Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th St, SW - STE TW-A325
Washington, DC 20554

RE: Docket No. 06-36
Waitsfield-Fayston Telephone Co., Inc. d/b/a Waitsfield and Champlain Valley
Telecom and Green Mountain Long Distance Service, Inc.
Form 499 Filer ID: 803463 and 817194

Greetings:

On February 4, 2011, I filed the annual CPNI certification for the two affiliated companies listed above. There actually were a total of two separate joint filings: (1) a request for confidentiality along with an unredacted certification; and (2) a redacted certification. The two documents were filed on paper, in accordance with Public Notice DA 11-159, dated Jan. 28, 2011.

On February 10, 2011, I received a telephone call from Tanishia Proctor, Enforcement Bureau, concerning two similar joint filings I had made for a group of five affiliated companies. Ms. Proctor asked me to file the redacted certification via ECFS, and to do the filing five times, once for each of those five companies. Ms. Proctor noted that it was OK to make a joint filing as I had done; the Bureau simply was requesting to have the documents filed again electronically under each of the five companies. In our telephone conversation, I also agreed to file the redacted certifications for the two captioned companies via ECFS, once for each of the companies in the joint filing.

I am hereby filing the redacted certification for the captioned companies twice via ECFS. I have attached to this letter a copy of the redacted certification, and a copy of the date-stamped first page. As I complete the ECFS menu, I am listing one of the two companies for each of the two filings, as requested by the Bureau. Before doing these electronic filings, the redacted certification was not available in ECFS.

The request for confidentiality along with the unredacted certification is noted once in ECFS –

corresponding to the one paper document that was filed. Because I cannot file confidential documents via ECFS, I am unable to make two separate electronic filings of the confidential document. Therefore, please note that the confidential document listed in ECFS under "Waitsfield-Fayston Telephone Co., Inc." (ECFS ID 6016168068) applies to both of the captioned affiliated companies, as indicated on the title page of that document.

If you have any questions, please contact me.

Respectfully submitted,


Susan J. Bahr

Enclosures

cc: Best Copy and Printing, Inc.
(via email to FCC@BCPIWEB.COM)

TO: Marlene Dortch, Secretary
Federal Communications Commission

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

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

Date filed: February 4, 2011

Name of companies covered by this certification:

Waitsfield-Fayston Telephone Co., Inc. d/b/a Waitsfield and Champlain Valley Telecom
Green Mountain Long Distance Service, Inc.

Form 499 Filer ID: 803463 and 817194

Name of signatory: Roger Nishi

Title of signatory: Vice President – Industry Relations

I certify that I am a corporate officer of the above Companies. Acting as an agent of the Companies, I hereby certify that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC's) rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

- Attached to this certification is Statement #1 explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.
- The Companies have not taken any actions against data brokers in the past year.
- In Statement #2, we discuss the processes that pretexters are using to attempt to access CPNI.
- In Statement #3, we explain additional procedures that the Companies are taking to protect CPNI.
- The Companies have received no customer complaints in the past year concerning the unauthorized release of CPNI.

The Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies also acknowledge 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.

A copy of this Certificate and Statements, but with redactions in Statements 2 and 3, is being filed for public inspection. In addition, this Certificate with unredacted Statements is being filed

with a Request for Information to Be Withheld from Public Inspection.

If you have questions, please contact: Susan Bahr, Esq., Law Offices Of Susan Bahr, PC, PO BOX 2804, Montgomery Village, MD 20886-2804, sbahr@bahrlaw.com, (301) 926-4930.

Name (signature): *Roger Nishi, Roger Nishi*

Date: February 4, 2011

**STATEMENT #1
CPNI PROCEDURES**

- 1. To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without Customer approval, the Companies employ the following procedures.**

Waitsfield-Fayston Telephone Co., Inc. (WCVT) and Green Mountain Long Distance Service, Inc. (GMLD) (together referred to as "The Companies") occasionally market services to our customers in situations that do not require customer approval. For example, WCVT markets calling features to current local customers and GMLD markets long distance calling plans to its current customers.

- 2. To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Companies employ the following procedures.**

The Companies occasionally use oral notice to obtain limited, one-time use of CPNI for customer telephone contacts for the duration of a call, in accordance with the CPNI rules. The Companies do not otherwise make use of CPNI in a way that requires notice and approval.

In addition, the Companies do not use, disclose or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, the Companies do not send notifications or request corresponding approvals from their customers. The Companies do not use joint venture partners or independent contractors for marketing purposes.

- 3. To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Companies employ the following procedures.**

As described above, CPNI is used only in limited instances, and in those instances, customer notice and approval is required before access is made to a customer's CPNI. The Companies provide periodic in-house training sessions to personnel to ensure they are aware of when they are and are not authorized to disclose or use CPNI. Key senior staff have received training from outside consultants. The Companies have an express disciplinary process in place to handle any instances where improper use is made of CPNI; the process is described in the Companies' employee manuals. The process can include reprimand, retraining and separation from employment. The Companies maintain records of marketing campaigns, although they do not use CPNI for marketing campaigns. The Companies have a supervisory review process regarding compliance with the CPNI rules. They retain records of compliance as required by the rules, and sales personnel obtain supervisory approval of proposed requests for the use of CPNI.

4. To ensure compliance with Section 64.2010 of the FCC's CPNI rules, concerning safeguards for disclosing CPNI, the Companies have employed the following procedures ever since Section 64.2010 went into effect.

Telephone access to call detail information is provided only in accordance with the guidelines established in the CPNI rules. The Companies are working with customers to establish passwords and back-up authentication methods, if requested by the customer. Telephone access to non-call detail information is provided after the customer is authenticated. In-store access to CPNI is provided after a customer provides a valid photo ID. The Companies do not provide online access to CPNI without a user name and password. Whenever account information changes as specified in Section 64.2010, the Companies immediately notify the customer, via a letter mailed to the existing address of record (i.e., one that has been valid for 30 days as required by the rules).

5. To ensure compliance with Section 64.2011 of the FCC's CPNI rules, concerning notifications of security breaches, the Companies employ the following procedures.

All staff has been trained in procedures to follow to report breaches internally. The Companies have had no breaches since this rule went into effect. If a breach occurs, it will be confirmed and the appropriate regulatory personnel are prepared to make the required notifications to the United States Secret Service, the Federal Bureau of Investigation, and the customer, as required and permitted under Section 64.2011. Records of any such breaches and the corresponding notifications are maintained for at least two years.

CERTIFICATE OF SERVICE

I, Susan Bahr, hereby certify that on this February 4, 2011, I caused a copy of the foregoing to be sent to:

Best Copy and Printing, Inc.
445 12th Street, Suite CY-B402
Washington, DC 20554
(via email to FCC@BCPIWEB.COM)



Susan J. Bahr

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RECEIPT

**REDACTED -
FOR PUBLIC INSPECTION**

TO: Marlene Dortch, Secretary
Federal Communications Commission

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EB Docket No. 06-36

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FILED/ACCEPTED

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FEB - 4 2011

Name of signatory: Roger Nishi

**Federal Communications Commission
Office of the Secretary**

Title of signatory: Vice President – Industry Relations

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