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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
Franklin Telephone Co., Inc. and FranklinVT, LLC
Form 499 Filer ID: 809840 / 824340

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 certification for the two captioned companies via ECFS, once for each of the companies in the joint filing.

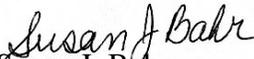
Today, I noticed that a redacted certification already appears in ECFS, listed under "Franklin Telephone Co., Inc. et al." I exchanged email with Ms. Proctor concerning whether I should make two additional filings for the two captioned affiliated companies. Ms. Proctor stated that separate filings should be done if the companies have separate filing ID numbers. Because the two captioned companies have different filing ID numbers and ECFS already has an entry for the redacted certification of "Franklin Telephone Co., Inc. et al", I am hereby filing the redacted certification in ECFS just once – for FranklinVT, LLC; that is the "Name of Filer" that I'm entering in the ECFS menu. I have attached to this letter a copy of the redacted certification, and

a copy of the date-stamped first page.

The request for confidentiality along with the unredacted certification is already apparently noted twice in ECFS – corresponding to the one paper document that was filed. Both ECFS entries list the filer as "Franklin Telephone Co., Inc. et al". The two filings have ECFS IDs 6016168927 and 6016168067. Because I cannot file confidential documents via ECFS, I am unable to file the confidential document under the name of FranklinVT, LLC. Therefore, please note that the aforementioned confidential document apparently listed twice in ECFS 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 company covered by this certification: Franklin Telephone Co., Inc. and
FranklinVT, LLC

Form 499 Filer ID: 809840 / 824340

Name of signatory: Kimberly Gates Maynard

Title of signatory: Treasurer

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.

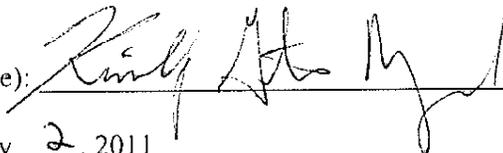
- Attached to this certification is Statement #1 explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.
- No actions were taken against data brokers in the past year.
- In Statement #2, 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.
- There have been 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):  _____

Date: February 2, 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.**

The Companies have not used and do not plan to use CPNI for marketing. The Companies do limited to no marketing – and do not use CPNI for that marketing.

- 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 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.**

The Companies use one and only one customer service representative (CSR), who attends regional training programs on a regular basis. We have an express disciplinary process in place to handle any instances where improper use is made of CPNI. This process could include a write up on the employee's record and retraining in CPNI procedures. We have a supervisory review process regarding compliance with the CPNI rules; we retain records of compliance as required by the rules, and sales personnel obtain supervisory approval of proposed requests for opt-out approvals.

- 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 customers. 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. The Companies do not have contracts with business customers and therefore do not need to make modifications to provide alternative authentication regimes. Whenever account information changes as specified in Section 64.2010, the Companies immediately notify the customer, usually via a telephone call..

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 have been trained in procedures to follow to report breaches internally. We have had no breaches since this rule went into effect. When a breach is confirmed, 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 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)

A handwritten signature in black ink that reads "Susan J. Bahr". The signature is written in a cursive style with a horizontal line underneath the name.

Susan J. Bahr

7

RECEIPT
REDACTED -
FOR PUBLIC INSPECTION

TO: Marlene Dortch, Secretary
Federal Communications Commission

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

FILED/ACCEPTED

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

FEB - 4 2011

Date filed: February 4, 2011

Federal Communications Commission
Office of the Secretary

Name of company covered by this certification: Franklin Telephone Co., Inc. and
FranklinVT, LLC

RECEIVED - FCC

Form 499 Filer ID: 809840 / 824340

FEB - 4 2011

Name of signatory: Kimberly Gates Maynard

Federal Communications Commission

Title of signatory: Treasurer

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- 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 section 64.2001 et seq. of the Commission's rules.
- No actions were taken against data brokers in the past year.
- In Statement #2, we discuss the processes that pretexters are using to attempt to access CPNI.
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