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

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 21, 2011

Name of Companies covered by this certification: Zito Media Voice, LLC, DuCom Treasure Lake Voice, LLC, St. Marys Voice, LLC, Zito Media Communications-McKean County, LLC and Zito Midwest, LLC

Form 499 Filer IDs: 826202, 826280, 826565, 827203 and 828526

Name of Signatory: Colin H. Higgin

Title of Signatory: Vice President

I, Colin H. Higgin, certify that I am an officer of Zito Media Voice, LLC, DuCom Treasure Lake, LLC, St. Marys Voice, LLC, Zito Media Communications-McKean County, LLC and Zito Midwest, LLC ("Zito Media"), 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 Federal Communications Commission's (the "Commission") 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 it is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Zito Media does not have knowledge of any data breaches in 2010 that resulted in the unauthorized disclosure of CPNI. Zito Media has not taken any actions against data brokers during the 2010 calendar year. Zito Media has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Zito Media has taken measures to protect against attempts to gain unauthorized access to CPNI. Zito Media has not discovered any information about the processes that pretexters are using to attempt to gain access to CPNI, other than the information that is already contained publicly in this docket. As mentioned in Attachment A, Zito Media has taken several measures to protect CPNI, including, without limitation, conducting training regarding the appropriate use of CPNI, maintaining customer verification processes, encrypting data and applying role-based authorization (limiting employees with access to data on a need-to-know basis).

Zito Media 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. Zito Media also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Name: Colin H. Higgin
Title: Vice President
February 21, 2011

ATTACHMENT A
ZITO MEDIA VOICE, LLC, DUCOM TREASURE LAKE, LLC, ST. MARYS VOICE, LLC, ZITO MEDIA COMMUNICATIONS-MCKEAN COUNTY, LLC AND ZITO MIDWEST, LLC
STATEMENT OF CPNI OPERATING PROCEDURES

Zito Media Voice, LLC, DuCom Treasure Lake, LLC, St. Marys Voice, LLC, Zito Media Communications-McKean County, LLC and Zito Midwest, LLC ("Zito Media") are interconnected voice-over-internet-protocol ("VoIP") provider carriers doing business in Pennsylvania. Zito Media is locally owned and operated and provides high-quality digital voice services to a small number of customers in small communities in North and Central Pennsylvania, Southern Illinois and Western Kentucky.
Zito Media has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. Zito Media provides this statement pursuant to Section 64.0009(e) of the Commission rules, 47 C.F.R. § 64.0009(e), to summarize those procedures and policies.

Permissible Use/Disclosure/Access to CPNI:

Zito Media may use, disclose and/or permit access to CPNI for the following purposes:

(1) To provide the telecommunications service from which such information is derived;
(2) For the provision of services necessary to, or used in, the provision of such telecommunications service, including the publishing of directories;
(3) To initiate, render, bill and collect for telecommunications services;
(4) To protect the rights or property of Zito Media, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
(5) To provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves the user of such information to provide such services; and
(6) As required by law, such as in response to a validly issued subpoena.

Employee Training/Disciplinary Process:

Zito Media trains its personnel as to what information is classified as CPNI when they are authorized and not authorized to use this information.
Zito Media has an express disciplinary process in place for the misuse of CPNI, which differentiates between intentional and unintentional misuse. This disciplinary process includes the potential for termination. A contact is given for personnel who have questions regarding Zito Media's CPNI policies.

Data Security Breaches/Requests for CPNI:

Zito Media has procedures in place to notify the United States Secret Service and the Federal Bureau of Investigation in the event of a data breach. Unless law enforcement directs otherwise, we will notify affected customers of the breach as soon as practicable after the expiration of the seven business day waiting period. We will maintain a record in accordance with section 64.2011(d) of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two years.

Zito Media also has procedures in place for responding to requests for CPNI from any person other than the customer, such as a validly issued subpoena from law enforcement personnel.

Use of CPNI for Marketing Purposes:

Currently, Zito Media does not use CPNI to conduct outbound marketing or in connection with its sales and marketing campaigns. In the event that Zito Media does use CPNI for marketing purposes, it will fully comply with the applicable Commission rules.

Customer Complaints:

Zito Media has procedures in place to track any complaints it receives concerning the unauthorized use, disclosure, or access to CPNI. If we receive complaints regarding CPNI, we will break them down by category, and provide a summary of the complaints in the annual certification that we provide to the Commission.

CPNI Safeguards:

Zito Media has adopted authentication procedures for in-coming calls, customer-service representative initiated inquiries, online account access, and in-store access.
Zito Media has implemented procedures for online account access. Customers must use a password that has been established based on non-readily available biographical information or account information to access their account online. Zito Media also has implemented procedures to address lost or stolen passwords.
Zito Media prohibits its employees from releasing call detail information to any customer during an in-bound call. Instead, Zito Media employees are required to provide any call detail information that might be requested by sending it to the customer's address of record or by calling the customer at his/her telephone number of record.
Zito Media employees are required to be mindful of any attempts to compromise customer CPNI, including, but not limited to, any actions that pretexters may be taking to gain access to CPNI. Zito Media employees are required to notify their supervisor of any such attempts.
Zito Media also has implemented network security measures. Among other protections, Zito Media has implemented role-based access to CPNI, such that it provides access to CPNI and other customer information non a need-to-know basis.

Notification of Account Changes:
Zito Media will notify customers immediately of certain account changes, including (a) any change in the customer's online password; (b) change of a customer's address of record; (c) change of any significant element of the customer's online account; and (d) change to the back-up means of authentication for lost or stolen passwords.