River City Wireless of Tennessee, LLC
5730 Brainerd Rd
Chattanooga, TN 37411
Phone: 423-296-8008 Fax: 423-296-8009

February 22, 2011

VIA ELECTRONIC COMMENT FILING SYSTEM

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

Re: River City Wireless of Tennessee, LLC
Annual CPNI Compliance Certification, EB Docket No. 06-36

Dear Secretary Dortch:

Pursuant to section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. §64.2009(e), enclosed for filing in the above-referenced docket, please find the annual CPNI compliance certification of River City Wireless of Tennessee, LLC.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Sincerely,

cc: Best Copy and Printing, Inc. (via e-mail)

Chief, Telecommunications Consumers Division, FCC Enforcement Bureau, for File No. EB-06-TC-6030 (via e-mail)

River City Wireless of Tennessee, LLC

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

EB Docket 06-36

River City Wireless of Tennessee, LLC

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for calendar year 2010.

Date Filed: 2/22/2011

Name of company covered by this certification: River City Wireless of Tennessee, LLC

Form 499 Filer ID: 822938

Name of signatory: Alan Ray

Title of signatory: Chief Executive Officer

I, Alan Ray, certify that I am an officer of the company named above ("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 Federal Communications Commission's ("Commission's) Customer Proprietary Network Information ("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 at either state commissions, the court system, or at the Commission) against data brokers in the past year. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's operating procedures for compliance with the Commission's CPNI rules. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

This certification is made to the best of my knowledge, information and belief.

Signed: Alan Ray - CEO

Dated: 2-22-2011

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains the operating procedures of River City Wireless of Tennessee, LLC ("Company") to ensure compliance with the Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission" or "FCC").

A. The Company uses CPNI for the purpose of providing a customer with the requested service. The Company also uses CPNI for various purposes permitted by law. For example, the Company may use, disclose or permit access to CPNI to initiate, render, bill, and collect for its telecommunications services. The Company may also use, disclose or permit access to CPNI to protect the rights or property of the Company, or to protect users of those services and other service providers from fraudulent, abusive, or unlawful use of, or subscription to, such services. The Company may use, disclose or permit access to CPNI to provide inbound telemarketing, referral, or administrative services to the subscriber for the duration of the call, if such call is initiated by the subscriber and the subscriber approves of the use of such CPNI to provide such service. The Company may use, disclose or permit access to CPNI to provide call location information concerning the user of a commercial mobile service. The Company may use, disclose or permit access to CPNI for the purpose of providing carrier premise equipment ("CPE") and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, protocol conversion, and to market services formerly known as adjunct services, such as, but not limited to, speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding and certain Centrex features.

B. The Company does not use, disclose or permit access to CPNI for marketing purposes other than described in A above. The Company also does not sell, disclose or otherwise permit access to CPNI to third parties for marketing purposes.

C. The Company does not provide CPNI over the telephone and does not provide access to CPNI online. The Company will provide CPNI in person at retail locations but only to a subscriber that first presents a valid photo ID matching the subscriber's account information.

D. The Company will disclose CPNI upon affirmative written request by a customer to any person designated by the customer. The Company verifies all affirmative written customer requests.

E. Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without customer authorization), the Company will notify the US Secret Service ("USSS") and Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni.

- After 7 days of USSS and FBI notice, if the Company has not received written direction from USSS or FBI, the Company will notify the customer of the breach, unless the USSS and FBI have extend the period for such notice.

- For 2 years following USS and FBI notice, the Company will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates INS notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.

F. The Company employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures.

G. The Company employs appropriate remedies against those persons violating the Company's internal CPNI policies and procedures. Remedies may include, but are not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.