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February 24, 2011

Via ECFS

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

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

Dear Ms. Dortch:

Davidson Telecom, LLC ("the Company"), by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its annual Customer Proprietary Network Information (CPNI) certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Michael R. Bennet

cc: Best Copy and Printing, Inc.
Attachments

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 filed: February 24, 2011

Name of company(s) covered by this certification: Davidson Telecom, LLC

Form 499 Filer ID: 823546

Name of signatory: Barry R. Rubens

Title of signatory: President

I, Barry R. Rubens, 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 Federal Communications 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 (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 has not received any customer complaints in the past year 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 _____

CPNI Usage Policy Statement

Pursuant to Section 64.2009(e) of the Federal Communications Commission's (FCC) rules, this statement explains how Davidson Telecom, LLC's (Company) operating procedures ensure compliance with Part 64, Subpart U of the FCC's rules.

A. The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. The Company utilizes CDG's Modularity billing product for customer invoicing and customer support. The Modularity product allows the company to ensure the identity of individuals requesting information in certain situations through use of a Secret Question and PIN. The Modularity product also supports the CPNI Opt In/Out indicator and date requirements. In addition, notification is supported in the event the Secret Question, PIN or address has been modified.

B. The Company has implemented personnel training as to when they are and are not authorized to use CPNI. The Company does not share CPNI information with joint venture partners or independent contractors (except for billing and collection services). However, the one part-time dedicated individual that is responsible for the Company's billing process has participated in training through CDG's implementation of the CPNI rules, and through internal training and review of the CPNI rules as they went into effect. The Company's CPNI procedures describe the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.

C. Neither the Company, its agents', affiliates', joint venture partners' or independent contractors' have implemented sales and marketing campaigns that use customers' CPNI information.

D. The Company, at this time, has not implemented any outbound marketing situations. If at a future date the Company elects to implement outbound marketing situations, it will develop a supervisory review process.

E. The Company requires affirmative written/electronic subscriber approval for the release of CPNI to third parties.

F. The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-store visit.

G. In the event of a CPNI breach, Company complies with the FCC's rules regarding notice to law enforcement and customers. Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI

regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two years.

H. Company has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.