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BY ELECTRONIC FILING

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

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 25, 2011

Citizens Telephone Company of Hammond NY, Inc.	499 Filer ID # 803598
Citizens Long Distance, Inc.	499 Filer ID # 820090
Topsham Telephone Company, Inc.	499 Filer ID # 801579
Castle Cable TV, Inc.	499 Filer ID # 828160

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

John Kuykendall
Vice President
jkuykendall@jsitel.com

Attachment

cc: Best Copy and Printing, Inc. *via email to fcc@bcpiweb.com*

CITIZENS TELEPHONE COMPANY OF HAMMOND NY, INC.
& THREE AFFILIATED COMPANIES

P. O. Box 217 Hammond, NY 13646 315-324-5911

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date signed: February 25, 2011

Names of Companies Covered by this Certification:	499 Filer ID
Citizens Telephone Company of Hammond NY, Inc.	803598
Citizens Long Distance, Inc.	820090
Topsham Telephone Company, Inc.	801579
Castle Cable TV, Inc.	828160

Name of signatory: Donald A. Ceresoli, Jr.

Title of signatory: President

I, Donald A. Ceresoli, Jr., certify that I am an officer of the affiliated companies named above (collectively and individually "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 CPNI rules of the Federal Communications Commission ("Commission"). *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 in 2010. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

Attachment

CITIZENS TELEPHONE COMPANY OF HAMMOND NY, INC. & THREE AFFILIATED COMPANIES

Citizens Telephone Company of Hammond NY, Inc. 499 Filer ID 803598
Citizens Long Distance, Inc. 499 Filer ID 820090
Topsham Telephone Company, Inc. 499 Filer ID 801579
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P. O. Box 217 Hammond, NY 13646 315-324-5911

2010 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 25, 2011

This statement accompanies the Company's 2010 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding

prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented procedures to notify customers of account changes.

*The Company does not provide customers with on-line access to customer account information.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.