

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 filed for calendar year for 2010

Date filed: February 23, 2011

Name of company covered by this certification: Morris Broadband, LLC

Form 499 Filer ID: 827983

Name of signatory: Craig S. Mitchell

Title of signatory: Senior Vice-President

I, Craig S. Mitchell, 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 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 be subject it to enforcement action.

Signed C S Mitchell  
MORRIS BROADBAND, LLC  
AS ITS: SR. VICE PRESIDENT

## ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE

### Statement Regarding CPNI Operating Procedures

Morris' written CPNI Operating Procedures ensure that Morris will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Morris' CPNI Operating Procedures are:

- A requirement that Morris have at all times a CPNI Compliance Supervisor to supervise the implementation of Morris' CPNI Operating Procedures.
- Procedures are in place for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI. Newly hired employees are given training of CPNI rules. Once the employee has a full understanding of CPNI rules a signed copy is kept on file. Each year a mandatory re-training is given to all employees with access to CPNI customer information to ensure compliance.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI is included in the training.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

Morris does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations.