BayRing
COMMUNICATIONS

February 15, 2011

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

Re: **Annual CPNI Compliance Certification, EB Docket No. 06-36**

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate and accompanying statement of Freedom Ring Communications, L.L.C. dba BayRing Communications.

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

Sincerely,

Jennifer M. Hassen

Cc: Federal Communications Commission, Enforcement Bureau (2)
Best Copy and Printing, Inc. (electronic)

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

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: February 15, 2011

Name of company covered by this certification: Freedom Ring Communications, L.L.C. d/b/a BayRing Communications

Form 499 Filer ID: 818330

Name of signatory: Benjamin P. Thayer

Title of signatory: President

I, Benjamin P. Thayer, 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 in the past year. The company is not aware of any activity by data brokers or pretexters with respect to its customers' CPNI during the reporting year; the company has no information to report with respect to the processes pretexters are using to attempt to access CPNI.

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

Signed _____

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

EB Docket No. 06-36

Freedom Ring Communications, L.L.C. dba BayRing Communications (BayRing) submits this accompanying statement to explain how the company's procedures ensure that the company is in compliance with the substantive requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

1. Compliance with § 64.2007, approval required for use of customer proprietary network information:

In those instances in which customer approval is required for use of CPNI, BayRing obtains approval through oral, written or electronic methods. BayRing obtains opt-out approval as described in item 2, below. The customer's approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by BayRing remains in effect until the customer revokes or limits such approval or disapproval. Records of customers' CPNI approvals are kept for at least one year.

2. Compliance with § 64.2008, notice required for use of customer proprietary network information:

Prior to soliciting the customer's opt-out approval for use of CPNI, BayRing provides written or electronic notification of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. The content of such notification complies with the Commission's rules. BayRing keeps records of notification for at least one year. Opt-out notices are provided to new customers and to existing customers every two years, and customers are given a minimum of 30-days to opt-out before they are presumed to have consented to use of their CPNI. For one-time use of CPNI on inbound and outbound customer telephone contacts for the duration of the call, BayRing's representatives obtain oral consent from the customer pursuant to a customer service script that complies with the Commission's rules.

3. Compliance with § 64.2009, safeguards required for use of customer proprietary network information:

BayRing has a system in place by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Specifically, BayRing identifies all customers who have opted-out of use of their CPNI by entering a comment on the customer's account which triggers a warning message informing personnel of the customer's disapproval of the use of their CPNI. Personnel are trained as to when they are and are not authorized to use CPNI, and BayRing has an express disciplinary process in place for noncompliance. A record in compliance with the Commission's rules is kept for a minimum of one year of BayRing's marketing campaigns that use our customers' CPNI and instances in which our customers' CPNI is disclosed or provided to, or accessed by, third parties. In addition, BayRing has in place and keeps records for a minimum of one year of a supervisory review process regarding compliance with the rules for outbound marketing situations, which requires sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval.

4. Compliance with § 64.2010, safeguards on the disclosure of customer proprietary network information:

BayRing has physical security, information technology and personnel measures in place to discover and protect against attempts to gain unauthorized access to CPNI. Customers are asked to establish a password and provide answers to back-up security questions that do not use readily available biographical information, or account information. Customers who forget their password and cannot provide the answer to their back-up security questions to retrieve their password are required to be re-authenticated to establish a new password and new answers to back-up security questions. Passwords are required for a customer to obtain online access to CPNI, and prior to disclosure to the customer of call detail information over the telephone. Customers who do not have a password may have BayRing send call detail and other account information to the customer's billing address of record or to an e-mail address that has been associated with the customer's account for at least thirty (30) days. Customers requesting CPNI at one of BayRing's retail locations must present a valid photo ID matching the customer's account information.

In the event a password, customer answer to a back-up security question, online account, or address of record is created or changed, BayRing immediately provides notice to the customer at the pre-existing telephone number of record, billing address of record or e-mail address of record. Such notice informs the customer as to the nature of the change, but does not reveal the changed information.

5. Compliance with § 64.2011, notification of customer proprietary network information security breaches:

BayRing has not experienced any CPNI breaches during the reporting year. However, BayRing has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, BayRing has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which record would be kept for a minimum of two years.