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February 28, 2011

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VIA ECFS

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 Ms. Dortch:

Virgin Islands Telephone Corporation d/b/a Innovative Telephone, by its attorneys and pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), hereby submits its annual certification of compliance with the Commission's customer proprietary network information (CPNI) rules for calendar year 2010.

Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Edgar Class
Edgar Class
Counsel to Virgin Islands Telephone Corporation d/b/a Innovative Telephone

cc: Best Copy and Printing, Inc. (via email)

Enclosure

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

1. Date filed: February 28, 2011

2. Name of company covered by this certification: Virgin Islands Telephone Corporation d/b/a Innovative Telephone

3. Form 499 Filer ID: 803418

4. Name of signatory: Seth R. Davis

5. Title of signatory: CEO and President

6. Certification:

I, Seth R. Davis, 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 actions against data brokers in the past year.

The company has not received 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 _____

CEO and President

Virgin Islands Telephone Corporation d/b/a Innovative Telephone

Attachment: Accompany Statement explaining CPNI procedures

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

Virgin Islands Telephone Corporation d/b/a Innovative Telephone ("the Company") adheres to the following guidelines:

General Company Policies

The Company uses, discloses, or permits access to CPNI to protect the rights or property of the Company, or to protect users of services it provides and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

The Company shares CPNI only among the carrier's affiliated entities that provide a service offering to the customer. Except as noted herein, the Company does not share CPNI with its affiliates from which its customer does not take service.

The Company does not use, disclose, or permit access to CPNI to market to a customer service offerings that are within a category of service to which the subscriber does not already subscribe from the Company, unless: (i) the Company has customer approval to do so, or; (ii) such CPNI falls within the exceptions specified in 47 C.F.R. § 64.2005(c), or Section 222(d) of the Communications Act.

Company Policies Regarding the Notice Required for Use of Customer Proprietary Network Information.

Prior to any solicitation for customer approval, the Company provides notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.

The Company may seek alternatively either "opt-in" or "opt-out" approval consistent with applicable FCC requirements in order to obtain authorization to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services to that customer. The Company, subject to opt-out approval or opt-in approval, may disclose its customer's individually identifiable CPNI, for marketing communications-related services to: that customer; its agents; its affiliates that provide communications-related services; and its joint venture partners and independent contractors. The Company also permits such persons or entities to obtain access to such CPNI for such purposes. Any such disclosure to or access provided to joint venture partners and independent contractors is undertaken in compliance with Joint Venture/Contractor safeguards set forth in Commission rules.

Except for use and disclosure of CPNI that is permitted without customer approval under 47 C.F.R. § 64.2005, or is otherwise permitted under section 222 of the Communications Act of 1934, as amended, the Company uses, discloses, or permits access to its customers' individually identifiable CPNI subject to opt-out approval in circumstances approved by the FCC.

Company Policies Regarding Safeguards for Use of Customer Proprietary Network Information.

Marketing - The Company maintains a record, electronically or in some other manner, of its own and, as may exist, its affiliates' sales and marketing campaigns that use its customers' CPNI. The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.
The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
The Company retains the record for a minimum of one year.

Customer Service - The Company has a training program for personnel of when they are and are not authorized to use CPNI. All Company employees are required to follow Company guidelines regarding the confidentiality of CPNI, and the Company will discipline employees for a violation of this policy.

Carrier Access Billing System

CPNI records are maintained in an electronic format in the Carrier Access Billing System with restricted access.

The Company has established a supervisory review process regarding its compliance with applicable FCC rules for outbound marketing situations and maintains records of its compliance with that process for a minimum period of one year. The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms it employs in this process do not work to such a degree that consumers' inability to opt-out is more than an anomaly.

Customer Initiated Telephone Contact

The Company does not release CPNI call detail information (such as the date, the called number, the length of the call etc.) based on a customer-initiated telephone contact unless one of the following criteria apply: (1) the customer provides a pre-established password to the Company customer service representative; (2) the Company customer service representative calls the customer back at the telephone number of record in order to disclose any requested specific call detail record information; or (3) the Company customer service representative mails the requested call detail information to the customer's address of record. However if we choose to use passwords, the passwords must not be publicly available or contain personal history information (such as a social security number or a mother's maiden name).

On-Line Account Access

On-line account access to CPNI call detail records has not been available.

Office Location Account Access

Customers requesting CPNI at a location where they walk into a business office must produce a valid photo identification matching the customer of record name on the customer account.

Notice Requirements - Account Changes

The Company has procedures in place to immediately notify a customer of changes to the customer's account, including whenever a password, customer response to a carrier designated back-up means of authentication (*i.e.*, shared secret), online account or address of record is created or changed.

Notice Requirements- Breach of CPNI

If an employee becomes aware of any suspected breach of CPNI protections, he or she is instructed to immediately notify the Compliance Officer for the Company who will then be responsible, in consultation with legal counsel, for determining if we have experienced a breach and then notifying law enforcement which includes the Secret Service and the Federal Bureau of Investigation.

Record of Breaches and Notification

We also keep a record of all discovered breaches and notifications of law enforcement. We also have procedures in place to notify law enforcement pursuant to FCC rules and procedures.