



March 1, 2011  
*Via ECFS Transmission*

Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36**  
**2010 CPNI Certification for WholeTel, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2011-02, DA 11-159, EB Docket No. 06-36, released January 28, 2011 and pursuant to 47 C.F.R. § 64.2009(e), WholeTel, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) and its supporting Statement for the year 2010. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3006 or [croesel@tminc.com](mailto:croesel@tminc.com) if you have any questions about this filing.

Sincerely,

Carey Roesel  
Consultant to WholeTel, Inc.

*CR/gs*  
*Enclosure*

cc: Best Copy and Printing ([FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
Kamran Bashir – WholeTel  
file: WholeTel – FCC CPNI  
tms: FCCx1101



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**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## Statement of CPNI Procedures and Compliance

### **Use of CPNI**

WholeTel does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. WholeTel has trained its personnel not to use CPNI for marketing purposes. Should WholeTel elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

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### **PROTECTION OF CPNI**

WholeTel has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

### **DISCLOSURE OF CALL DETAIL OVER PHONE**

WholeTel does not provide access to CPNI over the phone.

### **DISCLOSURE OF CPNI ONLINE**

WholeTel has instituted authentication procedures to safeguard the disclosure of CPNI on-line. WholeTel's authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. Customers wishing to have online access to billing information are required to establish a password and security question, without the use of readily available biographical information or account information, at the time of account set up. Unless the appropriate password is provided, WholeTel does not allow on-line access to CPNI.

WholeTel has established back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical information or account information. WholeTel's back-up authentication procedure operates as follows: The customer must provide a correct answer to the security question when prompted and only then will WholeTel send a new, temporary password to the email address associated with the account.

WholeTel has put into place procedures to notify customers whenever 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 without revealing the changed information or sending the notification to the new account information.

## **NOTIFICATION TO LAW ENFORCEMENT**

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. WholeTel will provide electronic notification of breach of CPNI within seven business days to the United States Secret Service and the Federal Bureau of Investigation. WholeTel will wait another full seven business days before notifying the affected customers of the breach unless otherwise directed by the relevant investigating agency.

WholeTel maintains electronic records of all breaches discovered and notifications made to the USSS and the FBI, and to customers. Records of discovered breaches will be maintained for at least two years.

WholeTel takes every reasonable precaution to protect the confidentiality of proprietary or personal customer information including secure storage of data, CPNI policy training for all employees with access to data, and strict adherence to the method and authorization required for release of CPNI.

## **ACTIONS AGAINST DATA BROKERS**

Company has not taken any actions against data brokers in the last year.

## **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2010.

## **INFORMATION ABOUT PRETEXTERS**

Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to diligently protect CPNI.