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FEB 24 2011

FCC Mail Room

February 9, 2011



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

RE: 2010 Annual CPNI Certification and Accompanying Statement of Millicorp  
EB Docket No. 06-36  
499 Filer ID No. 827949

Dear Ms. Dortch:

Millicorp hereby submits for filing the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in this self-addressed, stamped envelope provided for that purpose.

Please do not hesitate to contact me at 239-321-6119 or [duane.dyar@millicorp.com](mailto:duane.dyar@millicorp.com) if you have any questions or concerns.

Sincerely,

Duane Dyar  
VP Operations  
Millicorp

Cc: Best Copy and Printing, Inc.

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**STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY  
NETWORK INFORMATION (CPNI) RULES**

1. Millicorps' operating procedures ensure that Millicorp is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.
2. Millicorp follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Millicorp. Electronic files and databases containing CPNI are maintained on computers that are not accessible from the Internet or that are on the Company's intranet behind firewalls that are regularly monitored and tested for effectiveness. In additions, such electronic files and databases may be accessed only by authorized Company employees who have been provided a currently effective strong long ID and password (said password is periodically changed).

However, Millicorp cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore

- a. If an unauthorized disclosure were to occur, Millicorp shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") via a central reporting facility accessed through a link maintained by the FCC at <http://www.fcc.gov/eb/cpni/>.
  - b. Millicorp shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
  - c. Notwithstanding the provisions in subparagraph b above, Millicorp shall not wait the additional seven (7) days to notify its customers if Millicorp determines there is an immediate risk of irreparable harm to its customers.
  - d. Millicorp shall maintain records of discovered breaches for a period of at least two (2) years.
3. Millicorp has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI as well as the appropriate systems to identify the status of a customer CPNI approval before the use of CPNI. All employees are trained as to when they are, and are not authorized to use CPNI upon employment. Violation of these procedures by Company employees will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation.
    - a. Specifically, Millicorp prohibits its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
      - i. When the customer has pre-established a password.

- ii. When the information requested by the customer is to be sent to the customer's address of record, or
  - iii. When Millicorp calls the customer's telephone numbers of record and discusses the information with the party initially identified by customer when service was initiated.
- 4. Millicorp maintains a record of its own and its affiliates' sales and marketing campaigns that use Millicorp's customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. This information regarding sales and marketing campaigns shall be maintained for a minimum period of two (2) years.

FEB 24 2011

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

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

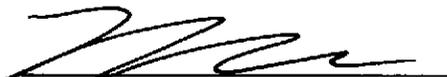
1. Date filed: February 10, 2011
2. Name of company(s) covered by this certification: Millicorp
3. Form 499 Filer ID: 827949
4. Name of signatory: Timothy Meade
5. Title of signatory: President/CEO

I, Timothy Meade, 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken 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 steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

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

Officer's Printed Name Timothy MeadeOfficer's Signature Title PresidentDate 2-15-2011