satco

Greg Ashcraft
Controller

South Arkansas Telephone Company
Your Link to the Telecommunications World™

January 6, 2012

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

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING – FEBRUARY 28, 2012

South Arkansas Telephone Company – Long Distance Operations
FCC 499 Filer ID: 802065

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, South Arkansas Telephone Company – Long Distance Operations is filing the attached CPNI Certification, as well as a statement of procedures for operational compliance with the FCC's CPNI Rules.

Sincerely,

Greg Ashcraft

Greg Ashcraft
Secretary/Treasurer

Attachment

Copies: 4 copies to Secretary
1 copy via email to Best Copy and Printing

P.O. Box 130 • Sheridan, AR 72150 • (870) 942-4344 • Fax (870) 942-7013

SOUTH ARKANSAS TELEPHONE COMPANY – Long Distance Operations
P. O. BOX 778, Hampton, AR 71744 (870) 798-2201

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

EB Docket 06-36

Annual 64.2009 (e) CPNI Certification for 2011

Date filed: January 6, 2012

Name of Companies Covered by this Certification:	499 Filer ID:
South Arkansas Telephone Company - Long Distance Operations	**802065**

I, Greg Ashcraft, 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 Commissions 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 any company at either state commissions, the court system, or at the Commission) against data brokers in 2011 and related to 2011. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

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

I hereby certify that the statements contained with the certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Sincerely,

Greg Ashcraft

Greg Ashcraft
Secretary/Treasurer

Attachments

SOUTH ARKANSAS TELEPHONE COMPANY – Long Distance Operations

South Arkansas Telephone Company, Inc. 499 Filer ID 802065

P. O. Box 778, Hampton, AR 71744 (870) 798-2201

2011 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

Due - February 28, 2012

This statement serves to explain how South Arkansas Telephone Company – Long Distance Operations is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information, The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. § 64.2000-2011).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003 (g) and Section 222 (f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding the Opt-Out process. Prior to any planned use of CPNI for marketing purposes, the Company will initiate the notification and Opt-Out process. The company does not provide CPNI to other parties, and thus has not used the Opt-In approval process. The Company has trained employees regarding prohibitions of the use of CPNI for marketing purposes. Prior to the initiation of any program that uses CPNI for marketing, the Company will train its employees regarding the need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and regarding approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as the Company may initiate the use of CPNI for marketing with the corresponding initiation of a notification of Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible records as to whether and how a customer has responded to Opt-Out approval, as required by Sections 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

During 2008, the Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

The authentication of customers prior to disclosing the CPNI on customer-initiated telephone contacts, or business office visits.

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers.

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not Applicable. No customer complaints regarding data brokers were received in 2011.

9. Disciplinary Process

The Company has an express disciplinary process in place to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Sections 64.2009(b).

10. Supervisory Review Process of Outbound Marketing

At this time, the Company does not engage in any outbound marketing programs. If at any time the company determines that it will engage in outbound marketing, it will establish a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009(c) and (d). Prior to any outbound marketing effort, sales personnel will obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts will be limited to CPNI not requiring of customers having given the Company prior approval. The Company will maintain records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.