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

January 17, 2012

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification, EB Docket 06-36

Dear Ms Dortch,

Attached is the Annual CPNI Certification and Accoumpanying Statement for 2011 Filed by DialToneServices, L.P..

If you have any questions please contact me at your earliest convenience.

Sincerely,

William J. Dorran
President

P.O. Box 470910 • San Fransisco, California 94147
Phone: 415.292.0955 or 0950 • Fax: 415.292.0956

DialToneServices

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

1. Date filed: January 17, 2012
2. Name of company(s) covered by this certification: DialToneServices, L.P.
3. Form 499 Filer ID: 825438
4. Name of signatory: William J. Dorran
5. Title of signatory: President
6. Certification:

I, William J. Dorran 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 (*i.e.,* 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 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 _____

Attachments: Accompanying Statement explaining CPNI procedures

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

DialToneServices, L.P. ("DTS") understands the importance of protecting CPNI, and the company's day-to-day operations have always been structured to be consistent with Section 222(c)(I) of the Act and the FCC's CPNI rules:

- **47 C.F.R. §§ 64.2005-2009 – Marketing:** DTS has never and does not use its customers' CPNI for marketing purposes, and it does not disclose or permit access to any other third parties for marketing or any other purpose. Therefore, DTS has not sought and does not seek customers' approval to do so. Accordingly, DTS does not provide notices in connection with requesting such customer approval (§ 64.2008), and has no procedural system for establishing the status of a customer's CPNI approval (§ 64.2009(a)), training program (§ 64.2009(b)), system of record-keeping (§ 64.2009(c)), or supervisory review process ((§ 64.2009(d)) in connection with doing so.

- **47 C.F.R. § 2010(a) – Safeguarding CPNI:** DTS safeguards its customers' CPNI and prevents unauthorized attempts to obtain access to such data by not disclosing any CPNI during customer-initiated phone calls and by not making CPNI available through online account access or retail stores. DTS provides customers with call detail information, usage data, and the like only via (i) phone bills mailed to customers' address of record, or (ii) telephone calls to customers at their telephone numbers of record. DTS CPNI resides on computer hardware that is located at DTS' third party call center building which is a "closed data shop" meaning that the only physical access to the CPNI is protected by adequate security systems and procedures to ensure that unauthorized persons cannot gain access.

- **47 C.F.R. § 2010(b) – Telephone Access to CPNI:** DTS does not employ a system of password authentication. Instead, in the context of customer-initiated calls, the customer service representatives ("CSRs") in the call center operated on behalf of DTS do not disclose customers' call detail information or other CPNI under any circumstances. The CSRs have no access to DTS customers' call detail information on a real-time basis. The CSRs do have access to customers' phone bills reflecting usage data and call records from prior billing periods, as well as the specific service plans to which customers subscribe. However, CSRs are not permitted to discuss such information with a customer <u>except</u> if the customer initiates discussion of specific items on the bill without the CSR's assistance and raises questions about such information. Any other requests relating to CPNI are relayed to DTS employees for call-back to the customer at the customer's telephone number of record.

- **47.C.F.R. § 2010(c) – Online Access to CPNI:** DTS does not provide online account access.

- **47 C.F.R. § 2010(d) – In-store Access to CPNI:** DTS does not operate retail stores. Personnel at retail stores that act as sales agents for DTS services do not have access to CPNI.

- **47 C.F.R. § 2010(e) and (f):** Due to the manner in which DTS operates, DTS does not need to use a system of password authentication to safeguard customers' CPNI, and accordingly does not have procedures for back-up customer authentication methods for lost or forgotten passwords or for customer notification upon password changes.

- **47 C.F.R. § 2011 – Notification of CPNI Security Breaches:** DTS has never had a complaint about CPNI or CPNI disclosure. The company believes that it has never had an instance of breach of CPNI and that there has never been a pretexting attempt to obtain the CPNI or DTS' customers. Of course, if such a breach were to occur, DTS would notify law enforcement authorities and customers pursuant to the FCC's rules.