

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Ste TW-A235
Washington, DC 20544

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

Annual 64.2009(e) CPNI Certification for 2011

Date filed: Jan. 10, 2012

Name of company(s) covered by this certification: Buckeye Telesystem, Inc.

Form 499 Filer ID: 817466

Name of signatory: John Martin

Title of signatory: President

I, John Martin, 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.*

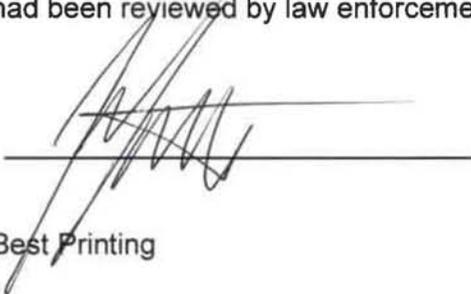
Attached to this certification is an accompanying statement marked Exhibit A explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company discovered one instance in 2011 concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information), and duly reported the incident (reference number 2011 - 1573497) pursuant to Commission rules.

A dump truck paving a highway pulled down a fiber optic line, causing outage. When the Company requested reimbursement for damages, truck owner requested an itemized accounting of amounts requested. In a letter to the truck owner dated July 2, 2010, Company agent inadvertently gave the names of four customers who were granted two days credit for the 5-hour outage, plus the amounts granted. The truck owner refused to pay, and a lawsuit was filed.

The defendant's attorney filed interrogatories in relation to facts in the case, and in answering a question about customers who experienced service outages, the same agent told the Company's attorney Company could not release Customer Proprietary Information. In gathering other documents for the case on Sept. 21, 2011, the agent realized that he had put the customer names in the July 22, 2010 letter. The Company was subsequently notified by the Administrator for CPNI reporting that the report had been reviewed by law enforcement and that no further action would be taken.

Signed _____


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EXHIBIT A
Buckeye Telesystem, Inc.,

These policies and procedures, which are briefly summarized below, ensure compliance by limiting access to, use of, and disclosure of CPNI.

Only authorized personnel can access CPNI. All personnel so authorized, such as customer service representatives and billing and collection personnel, are trained in the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.

The Company does not share CPNI among its affiliates other than in direct support of its business, unless prior customer approval has been obtained or no customer approval is needed. Further, the Company requires all independent contractors who have access to CPNI to enter an appropriate confidentiality agreement and to abide by applicable laws, regulations, policies, and procedures. The Company does not disclose CPNI to other third parties except as requested by the customer or as compelled or authorized by law.

The Company has always and will always require the customer to choose a password when establishing a service account.

The Company notifies customers of their right to restrict access to, use of, and disclosure of their CPNI annually through bill inserts. The Company maintains records of all customer requests to opt-out of any communication or related disclosure for all communication other than in direct support of the Company's business.

All out-bound marketing campaigns that utilize CPNI are subject to managerial approval and to verification of customer approval to use CPNI in this manner. Records related to such efforts are maintained for at least one year.

Managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness. The Company will report to the Commission instances, if any, in which opt-out mechanisms do not work properly.