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**BY ELECTRONIC FILING**

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 – January 20, 2012**

Clear Lake Independent Telephone Company	499 Filer ID # 805704
CL Tel Long Distance, Inc.	499 Filer ID # 813128
CL Tel Wireless, Inc.	499 Filer ID # 826481
Ventura Telephone Company, Inc.	499 Filer ID # 805707
Northland Communications, Inc.	CATV

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

A handwritten signature in black ink that reads 'John Kuykendall'.

John Kuykendall  
Vice President  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Best Copy and Printing, Inc. *via email to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)*

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6849 Peachtree Dunwoody Road  
Building B-3, Suite 300  
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**CLEAR LAKE INDEPENDENT TELEPHONE COMPANY**  
P. O. Box 66 Clear Lake, IA 50428 641-357-2111

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date signed: January 16, 2012

<u>Names of Companies Covered by this Certification:</u>	<u>499 Filer ID</u>
Clear Lake Independent Telephone Company	805704
CLTel Long Distance	813128
CLTel Wireless, Inc.	826481
Ventura Telephone Company, Inc.	805707
Northland Communications, Inc.	CATV(1)

Name of signatory: Thomas Lovell

Title of signatory: General Manager

I, Thomas Lovell, 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.*

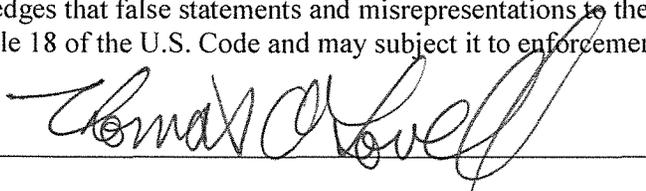
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *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. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, 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.]

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: \_\_\_\_\_



(1) Northland Communications, Inc. is not a telecommunications carrier and thus does not have a 499 Filer ID. Northland is covered by this certificate to the extent Clear Lake databases include both CPNI from telecommunications and non-telecommunications data arising from CATV operations, and with respect to limitations on use of CPNI for marketing CATV.

**CLEAR LAKE INDEPENDENT TELEPHONE COMPANY**  
**P. O. Box 66 Clear Lake, IA 50428 641-357-2111**

**Clear Lake Independent Telephone Company, Inc. 499 Filer ID 805704**  
**CLTEL Long Distance 499 Filer ID 813128**  
**CLTEL Wireless, Inc. 499 Filer ID 826481**  
**Ventura Telephone Company, Inc. 499 Filer ID 805707**  
**Northland Communications, Inc. (CATV)<sup>1</sup>**

**2011 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**January 16, 2012**

This statement serves to explain how Clear Lake Independent Telephone Company and its affiliated telecommunications carriers listed above (collectively and individually “Company”), are 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.*

*As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.*

**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 **not** 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.

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<sup>1</sup> Northland Communications, Inc. is not a telecommunications carrier and thus does not have a 499 Filer ID. Northland is covered by this certificate to the extent Clear Lake databases include both CPNI from telecommunications and non-telecommunications data arising from CATV operations, and with respect to limitations on use of CPNI for marketing CATV. .

**5. Customer Notification and Authorization Process**

The Company does not use CPNI for marketing and thus, at this time and thus has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, 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 on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

**6. Record of Customer CPNI Approval/Non-Approval**

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

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:\*

authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

implementation of procedures to notify customers of account changes.

\*The Company does not provide customers with on-line access to customer account information.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

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 actions taken against data-brokers.  
No customer complaints received.

**9. Disciplinary Process**

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

**10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

**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.