February 7, 2012
Via ECFS Filing

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

RE: Arizona Dialtone, Inc.
CY2011 Annual CPNI Certification Filing
EB Docket No. 06-36

Enclosed for filing please find the Annual CPNI Compliance Certification for calendar year 2011 submitted on behalf of Arizona Dialtone, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com. Thank you for your assistance in this matter.

Sincerely,

Robin Norton

Robin Norton
Consultant to Arizona Dialtone, Inc.

cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
cc: Thomas W. Bade - AZ Dialtone (via email)
file: AZ Dialtone - FCC
tms: FCCx1201

RN/lm

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012:	Covering calendar year 2011
Name of company(s) covered by this certification:	Arizona Dialtone, Inc.
Form 499 Filer ID:	821472
Name of signatory:	Thomas Bade
Title of signatory:	President

1. I, Thomas Bade, 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*.

2. 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 §64.2001 *et seq*. of the Commission's rules.

3. 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.

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

5. 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.

Thomas Bade, President
Arizona Dialtone, Inc.

2/6/12
Date

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance
For 2011
Arizona Dialtone, Inc.

Arizona Dialtone, Inc. is a very small CLEC operating in three states, providing basic local service as well as payphone access lines to payphone owners. We do not currently offer long distance service.

We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Arizona Dialtone, Inc. has trained its personnel not to use CPNI for marketing purposes. Should Arizona Dialtone, Inc. elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have put into place processes to safeguard our customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. No CPNI is disclosed to any outsiders except by Subpoena from a court. Only five employees have access to this information; these employees have been trained by the president of the company not to divulge CPNI under any circumstances.

We do not disclose CPNI over the telephone. No information is disclosed over the phone by any employee. Call data is mailed to the customer of record only upon verified end user request only. When a customer calls to initiate new service, they provide Arizona Dialtone with a personal pass code. This pass code can be made up of random letters or numbers, and do not contain readily available biographical or account information. When customers calls into our office with inquiries concerning their accounts they are asked to provide us with their personal pass code. If the customer cannot provide this pass code, no information is provided over the phone. They must then send us a request in writing along with a copy of a form of ID and they can request to change the pass code and receive what information they were looking for. All consumer inquiries are verified and recorded.

We do not provide on-line access to CPNI or any customer account information. If we elect to do so in the future, we will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information.

Customers are notified of a change to any account information by US Mail only to the address of record.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not experienced any breaches of CPNI to date, but will maintain records, either written or electronic, of any and all breaches discovered and notifications made to the USSS and the FBI, and to customers.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2011.

We do not have any information with respect to the processes Pretexters are using to attempt to access CPNI.