

TRI-COM LMR  
180 East Searsville Rd  
Montgomery, New York 12549

February 15, 2012

Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D. C. 20554

Re: Annual 47 C.F.R. S64.2009(c CPNI Certification for 2011  
EB Docket No. 06-36

Form 499 Filer ID: 825791

#### CERTIFICATION

I, Howard Iko, hereby certify that I am the owner 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 effective during the calendar year 2011 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. ss64.2001 et seq. of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement (i) that explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R.ss64.2001 et seq. of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI and(iv) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI.

Howard Iko  
Owner  
February 15, 2012

Tri-Com

180 East Searsville Road, Montgomery, NY 12549

## STATEMENT

Carrier has established operating procedures that ensure compliance with the FCC regulations regarding the protection of customer proprietary network information (CPNI).

Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Carrier continually educates and trains its employees regarding the appropriate use of the CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier maintains a record of its and its affiliates sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to the CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

Carrier took the following actions against brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the FCC: NONE.

The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: NONE.

Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.

Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

The following is a summary of all customer complaints received in 2011 regarding unauthorized release of CPNI:

Number of Customer complaints received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: NONE.

Category of complaint: NONE

NO COMPLAINTS IN 2011.