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: **02/20/2012**

2. Name of company(s) covered by this certification: **Rock Hill Telephone Company (d/b/a "Comporium Communications"), Fort Mill Telephone Company (d/b/a "Comporium Communications"), Lancaster Telephone Company (d/b/a "Comporium Communications"), Citizens Telephone Company (d/b/a "Comporium Communications"), Community Long Distance, Inc (d/b/a "Comporium Communications"), Springboard Telecom, LLC, and Comporium Wireless.**

3. Form 499 Filer ID: **803649, 803655, 803652, 804816, 803652, 804993, 819828, and FRN: 0005464284**

4. Name of signatory: **Matthew L. Dosch**

5. Title of signatory: **Senior Vice President of External Affairs**

6. Certification:

I, Matthew L. Dosch, 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

Rock Hill Telephone Company – FCC 499 Filer ID: 803649
Fort Mill Telephone Company – FCC 499 Filer ID: 803655
Lancaster Telephone Company – FCC 499 Filer ID: 803652
Citizens Telephone Company – FCC 499 Filer ID: 804816
Community Long Distance Company – FCC 499 Filer ID: 804993
Springboard Telecom, LLC– FCC 499 Filer ID: 819828
Comporium Wireless, LLC– FRN: 0005464284

P O. Box 470, Rock Hill, South Carolina 29731

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Rock Hill Telephone Company (d/b/a "Comporium Communications") and its affiliated companies, Fort Mill Telephone Company (d/b/a "Comporium Communications"), Lancaster Telephone Company (d/b/a "Comporium Communications"), Citizens Telephone Company (d/b/a "Comporium Communications"), Community Long Distance, Inc. (d/b/a "Comporium Communications"), Springboard Telecom, LLC and Comporium Wireless, LLC (collectively the "Company") is 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. §§ 64.2000-2009).

1. Identification of CPNI

The Company has improved customer service order management systems, refined inter-workgroup coordination procedures, created additional support materials for employees, and continued to train applicable 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 FCC's rules at Part 64, Subpart U, Section 64.2003(d) 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 updated customer accounts, improved customer service order management systems, established inter-workgroup coordination procedures, supplied support materials for employees, and continues to train applicable 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 inter-workgroup coordination procedures, supplies support materials for employees, and trained applicable employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established inter-workgroup coordination procedures, supplied support materials for employees, and trained applicable employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established inter-workgroup coordination procedures between relevant departments and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system of indicators for maintaining a readily accessible record of

whether and how a customer has responded to Opt-Out approval within our service order management system as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

7. 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 the FCC's Part 64, Subpart U CPNI rules.

8. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.