CROCKER & CROCKER
ATTORNEYS AT LAW

PATRICK D. CROCKER
patrick@crockerlawfirm.com

February 21, 2012

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

Filed Electronically Via ECFS

RE: Norristown Telephone Company, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Norristown Telephone Company, LLC, by its undersigned attorneys, hereby submits its 2011 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/crg

Enclosures

cc: Best Copy and Print, Inc. (via e-mail FCC@BCPIWEB.COM)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 20, 2012

Name of Company Covered by this Certification: Norristown Telephone Company, LLC

Form 499 Filer ID: 825480

Name of Signatory: Thomas Glynn

Title of Signatory: Managing Member

I am the Managing Member of Norristown Telephone Company, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Norristown Telephone Company, LLC. I have personal knowledge that Norristown Telephone Company, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Norristown Telephone Company, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Norristown Telephone Company, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2011. Norristown Telephone Company, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Norristown Telephone Company, LLC is taking to protect CPNI.

This Certification is dated this 20 day of February, 2012.

Thomas Glynn
Managing Member
Norristown Telephone Company, LLC

ACCOMPANYING STATEMENT

Norristown Telephone Company, LLC's ("Norristown") operating procedures ensure that Norristown is in compliance with the requirements set forth in the Commission's CPNI rules as set forth in 47 C.F.R. Part 64, Subpart U (the "**CPNI Rules**") as follows:

- Norristown's operating procedures prohibit the use, disclosure or release of CPNI, except as permitted or required under 47 U.S.C. § 222(d) and Rule 64.2005. Norristown does not use disclose or permit access to CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

- Norristown's operating procedures prohibit the use of CPNI in sales or marketing campaigns. Norristown does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" or "opt out" approval under the Commission's CPNI Rules. Norristown does not currently solicit "opt in" or "opt out" customer approval for the use or disclosure of CPNI.

- Norristown takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Norristown's operating procedures include safeguards designed to identify and protect against unauthorized use, disclosure or access to CPNI. Norristown authenticates a customer prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit.

- Norristown maintains a record of all instances where CPNI was disclosed or provided to third parties and where third parties were permitted access to CPNI. Records of all instances where CPNI was disclosed or provided to third parties, or where third parties were permitted access to CPNI, are maintained for a minimum of one year.

- Norristown does not release call detail CPNI over the telephone, based on customer-initiated telephone contact, unless the customer first provides a password that is not prompted by Norristown asking for readily available biographical information or account information or unless the customer is able to provide the relevant call detail information without Norristown assistance. If a customer does not provide a password and is not able to provide the relevant call detail information without Norristown assistance, Norristown only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Norristown provides customers with access to CPNI at Norristown's retail locations only if the customer presents a valid photo ID and the valid photo ID matches an authorized name on the customer account. If a customer is not able to provide a valid photo ID, he or she may instead provide the account password in the same manner required for customer-initiated telephone contact. If a customer is not able to provide a valid photo ID or account password in connection with an in person inquiry, Norristown only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Norristown has established a system of passwords and password protection. For a new customer establishing service, Norristown requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Norristown must first authenticate the customer without the use of readily available biographical information or account information, for example by calling the customer at the telephone Number of record or by using a personal identification number (PIN) or similar method to authenticate a customer.

- If a customer password is forgotten or lost, Norristown uses a backup customer authentication method that is not based on readily available biographical information or account information.

- If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on a customer-initiated telephone call by asking Norristown to send the call detail information to an address of record or by Norristown calling the customer at the telephone number of record. If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on personal inquiry at a retail location by providing a valid photo ID that matches an authorized name on the customer account or by asking Norristown to send the call detail information to an address of record or by Norristown calling the customer at the telephone number of record.

- Norristown has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication, address of record or other critical account information is created or changed.

- Norristown does not currently provide online account access to customers.

- All Norristown employees with access to or a need to use CPNI have been trained regarding Norristown's operating procedures and as to when they are and are not authorized to use, disclose or permit access to CPNI. Norristown's employees have been trained regarding the types of information that constitute CPNI and Norristown's safeguards (such as employee restrictions, password protection, supervisory review, etc.) applicable to Norristown's handling of CPNI. Norristown's employee manual includes a disciplinary policy requiring compliance with Norristown's operating procedures and sets forth penalties for noncompliance, up to and including termination of employment.

- Norristown has appointed a compliance officer and established a supervisory review process regarding Norristown's compliance with the Commission's CPNI Rules. Norristown's operating policies require that employees confer with the compliance officer if they are unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI. Norristown's operating policies require that the compliance officer confer with Norristown's legal counsel if he or she is unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI.

- Norristown's compliance officer has personal knowledge of Norristown's operating procedures and is authorized, as an agent of Norristown, to sign and file an annual CPNI compliance certification with the Commission.

- All Norristown employees and the compliance officer are trained to identify and protect against activity that is indicative of pretexting. All Norristown employees and the compliance officer are required to report any breach or potential breach of CPNI safeguards and/or any customer complaints regarding CPNI. In the event of a CPNI breach, Norristown's operating procedures require compliance with the Commission's CPNI Rules regarding notice to law enforcement and customers. Norristown must maintain records of any discovered breaches and notifications to the Secret Service and the FBI regarding those breaches, as well as the Secret Service and the FBI responses to such notifications, for a period of at least two years.