Delta Telecom, Inc.
7881 Tuscany Dr.
Poland, OH 44514
(330)990-5004 Telephone
(330)757-4265 Fax

February 22, 2012

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

RE: CPNI Certification due March 1, 2012; EB Docket No. 06-36
Filed Electronically Via ECFS

Dear Ms. Dortch:

Delta Telecom, Inc. hereby submits its CPNI compliance certification and accompanying statement, certifying compliance with Section 64.2001 *et seq.* of the Commissions's rules.

Should you require further information, please contact me at (330)990-5004 or millie@deltatelecominc.com.

Respectfully submitted,

Millie Baldwin
President

Enclosures

cc: Best Copy and Print, Inc. (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 under this certificate:
Delta Telecom, Inc.
7881 Tuscany Dr.
Poland, OH 44514

Form 499 Filer ID: 825941

Name of Signatory: Millie Baldwin
Title of Signatory: President

Certification:

I, Millie Baldwin, certify that I am the 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 Commissions's rules.

Delta Telecom has not taken any 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 and Delta Telecom has had no business relation with data brokers in the past year. Delta Telecom will report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps Delta Telecom is taking to protect CPNI if any business is done with data brokers in the future.

Delta Telecom has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sincerely,

Millie Baldwin
President

Delta Telecom, Inc.
7881 Tuscany Dr.
Poland, OH 44514
(330)990-5004

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Statement explaining how Delta Telecom, Inc. is in Compliance with the Requirements set forth in section 64.2001 et seq. of the Commissions's rules.

Safeguarding CPNI

It is the Company's policy to take reasonable measures to discover and protect against attempts to gain authorized access to CPNI. The Company will properly authenticate a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online access, or in-store visit, if applicable, as described herein.

Delta Telecom's protection of CPNI :

Customer initiated telephone contacts – It is the Company's policy to only disclose call detail information over the telephone, based on a customer-initiated telephone contact, if the customer provides the Company with the account number, billing name & address, and name of individual on file. The Customer must be able to provide call detail information to the Company during the customer-initiated call without the Company's assistance, and then the Company may discuss call detail information provided by the customer.

Passwords Procedures

To establish a password, the Company will authenticate the customer without the use of readily available biographical information, or account information. The Company may create a back-up customer authentication method in the event of lost or forgotten passwords, by such back-up customer authentication method will not prompt the customer for readily available biographical information or account information. If the customer is unable to provide correct password or correct responses for the back-up customer authentication method, the customer must establish a new password as described in this paragraph. All customer information is maintained in a password protected database that can be accessed only by authorized employees.

Delta Telecom does not have an online account access

In store visits

Customers must have valid photo identification for being an authorized person on the account.

Notification of Account Changes

The Company will notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed. This notification is not required when the customer initiates service, including the selection of a password at service initiation. This notification may be through a Company-originated voicemail or text message to the telephone number of record, or by mail to the address of record, and must not reveal the changed information or be sent to the new account information.

Business Customer Exemption

The Company may bind itself contractually to authentication regimes other than those described in this Section for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

Use of CPNI

Opt-out/in approval customer approval

Delta Telecom does not work with any agents or marketing companies. Its employees are the only individuals that have access to customer authorized access to CPNI information. Delta Telecom has a policy of providing to customers written CPNI notices and seeks to obtain approval from each customer to use CPNI for marketing purposes. Delta Telecom also provides existing customers with the ability to rescind their consent to the use of their CPNI at any time. Delta's CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclose of, and access to their CPNI. These notices also include information on our customers' right to choose to not receive marketing from Delta that is based upon Delta's use of their CPNI.

Contents of notice

The notice will include that the customer has the right and carrier has the duty to protect the confidentiality of CPNI. A description of what constitutes a CPNI, which includes their right to disapprove these uses and their right to withdraw use at any time.

Notices will also provide steps in which to grant or deny access to CPNI and that denial of approval will not affect provisioning of any services that customer subscribes to. Customers are made aware that all notices will remain in effect until revoked by customer or limited by customer of either their approval or denial.

Any solicitation to customer by Delta Telecom will be in accordance to customer's CPNI rights.

Training employees and express disciplinary process

Delta Telecom has a strict training process for protecting CPNI information. If an employee does not follow any of its policies the employees are reprimanded and are subject to termination of their employment with Delta Telecom. All of Delta Telecom

employees who have access to CPNI receive training about CPNI compliance. All employees are required to maintain the confidentiality of all information including customer information that is obtained as a result of their employment with Delta Telecom. Employees are required to sign a company handbook as a condition of employment detailing how employees are expected to treat any confidential information.

Notification of CPNI Security Breaches

Notification to law enforcement upon breach

Delta Telecom will notify the United States Secret Service (USSS) and Federal Bureau of Investigation (FBI) of any breach of its customer's CPNI within five days.

Delta Telecom shall notify law enforcement within five days of any breach of its customer's CPNI. After completing the process of notifying law enforcement and unless directed otherwise, Delta Telecom will notify customers in a manner that conforms to the relevant FCC rules. Delta Telecom will maintain a record of any CPNI related breaches for a period of at least two (2) years.

Record Keeping Requirements

Records of related breaches

Delta Telecom will maintain for a minimum of two years any records of breaches and notices to USSS and FBI.

Records of Approval

Delta Telecom will maintain for a minimum of one year records of customer approval of CPNI.

Records of Notification

Delta Telecom will maintain for a minimum of one year records of customer notices of customers rights to restrict CPNI.

Records of Marketing Campaign using CPNI

Delta Telecom will maintain for a minimum of one year records of any marketing campaigns specific to the CPNI used and the products and services offered.

Records of Supervisory Review Process

Delta Telecom will maintain for a minimum of one year the records for the supervisory review for outbound marketing. All sales personnel are required to obtain supervisory approval prior to any outbound marketing requests for customer approval.