Via Electronic Filing

February 23, 2012

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

RE: EB Docket No. 06-36, Certification of CPNI Compliance Filing

Dear Ms. Dortch:

Attached is the 2011 CPNI Certification for MGW Telephone Company, Inc., MGW Networks, L.L.C., and MGW Long Distance, L.L.C.

If there are any questions, I can be reached at 540-925-2255.

Sincerely,

R. Craig Smith

Attachments

cc: Best Copy and Printing, Inc. (via email to fcc@bcpiweb.com)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for the calendar year 2011

Date Filed: February 23, 2012

Name of companies covered by this certification	499 Filer ID
MGW Telephone Company, Inc	807990
MGW Networks, L.L.C.	828775
MGW Long Distance, L.L.C.	

Name of signatory: R. Craig Smith

Title of signatory: President

I, R. Craig Smith, certify that I am an officer of the companies named above (collectively and individually "Company"), 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (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 is not aware of any attempts made by pretexters to access CPNI and has not needed to take any action against pretexters. The Company has taken steps to protect CPNI from unauthorized access.

The Company has not received any 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.

Signature R. Craig Smith

MGW Telephone Company, Inc. 499 Filer ID 807990
MGW Networks, L.L.C. 499 Filer ID 828775
MGW Long Distance, L.L.C.

P. O. Box 105 Williamsville, VA 24487
540-925-2255

2011 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 23, 2012

This statement accompanies the Company's 2011 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI

1. Identification of CPNI

The Company has established procedures and trained 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 Section 64.2003(g) 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 established procedures and trained 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 procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to

other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures or confirmed existing procedures for compliance with new Section 64.2010 including, but not limited to the following:

- Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.
- The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

- No actions taken against data-brokers.
- No customer complaints received.

9. 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 Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.