



710 COUNTRY CLUB ROAD
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February 16, 2012

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

Received & Inspected

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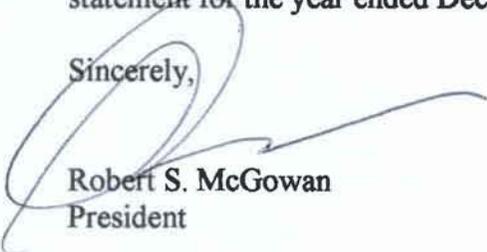
FCC Mail Room

Re: CPNI Certification Filing
EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Order in CC Docket No. 96-115 and WC Docket No. 06-36, is the CPNI Certification filing and accompanying statement for the year ended December 31, 2011 for FleetTalk Partners, Ltd.

Sincerely,



Robert S. McGowan
President

Copies:

One (1)
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445 12th Street, S.W.
Suite CY-B402
Washington, DC 20554

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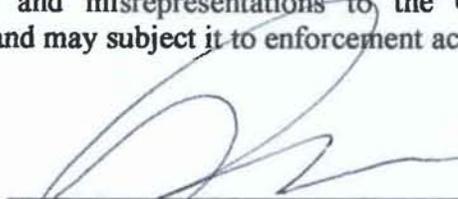
Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW Suite TW-A325
Washington, D.C. 20554

**Re: Annual 47 C.F.R. § 64.2009(c) CPNI Certification
Covering Calendar Year 2011
EB Docket No. 06-36
FleetTalk Partners, Ltd.
FCC 499 Filer ID: 820546 / FRN 0004250114**

I, Robert S. McGowan, hereby 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 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. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received 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.



Name: Robert S. McGowan
Title: President
Date:



FleetTalk Partners, Ltd.
499 Filer ID 820546 / FRN 0004250114
CPNI Certification

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STATEMENT

FleetTalk Partners, Ltd. ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- 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 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 has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: 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: Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system.



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- The following is a summary of all customer complaints received in 2011 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **None**
 - Category of complaint:
 - **0** Number of instances of improper access by employees
 - **0** Number of instances of improper disclosure to individuals not authorized to receive the information
 - **0** Number of instances of improper access to online information by individuals not authorized to view the information
 - **0** Number of other instances of improper access or disclosure
 - Description of instances of improper access or disclosure: **None**