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February 27, 2012

<u>Via ECFS</u>

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

Re: CPNI Certification and Accompanying Statement
EB Docket No. 06-36

Dear Ms. Dortch:

Advantage Cellular Systems, Inc. ("the Company"), by its attorneys and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its annual Customer Proprietary Network Information (CPNI) certification and accompanying statement.

Should you have any questions or need further information, please contact the undersigned.

Sincerely,

/s/

Marjorie Spivak

cc: Best Copy and Printing, Inc.

Attachments

4837-8674-7910, v. 1

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: *February 7, 2012*
2. Name of company(s) covered by this certification: Advantage Cellular Systems, Inc.
3. Form 499 Filer ID: 809445
4. Name of signatory: Craig Gates
5. Title of signatory: CEO
6. Certification:

I, Craig Gates, 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 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.

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 _____ Craig Gates, CEO

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

CPNI Usage Policy Statement

Pursuant to Section 64.2009(e) of the Federal Communications Commission's rules, this statement explains how Advantage Cellular Systems, Inc.'s ("Company") operating procedures ensure compliance with Part 64, Subpart U, of the FCC's rules.

Company's Usage of CPNI

The Company has CPNI Procedures that set forth the Company's CPNI policies and outline what CPNI is and when it may or may not be used without customer approval by the Company.

The Company's Procedures set forth that the use of CPNI for the purpose of marketing a service to which a customer does not already subscribe is prohibited without prior customer notice and approval. The Company will not provide to any affiliate, CPNI of any customer who does not also subscribe to the services provided by that affiliate, with out prior customer notice and approval.

The Company's Procedures clearly set forth when CPNI may be used without customer approval. The Company's Procedures provide that the Company may use CPNI to protect its rights and property, customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, Company's services.

The Company's Procedures require affirmative written/electronic customer approval for the release of CPNI to third parties.

The Company's Notice and Approval Procedures

The Company's Procedures set forth the manner in which the Company obtains approval from customers for the use of CPNI and whether such approval must be obtained through written, oral or electronic methods. The Company's Procedures set forth the period of time when such approval or disapproval to use CPNI remains in effect and the point in time when such approval is limited or revoked.

The Company's Procedures require that the Company maintain records of customer approval, whether oral, written or electronic, for at least one year.

The Company's Procedures set forth the procedures required to provide notification to customers prior to any solicitation for customer approval of the Company's right to use a customer's CPNI. Such procedures require the Company to provide a "Notice" to a customer explaining that the customer has a right, and the Company has a duty, under federal law to protect the confidentiality of CPNI. The Notice must explain to the customer that the customer may restrict the use of, disclosure of, and access to its CPNI. The Company maintains records of all such notifications for at least one year.

The Company's Procedures require that any customer notification provide information sufficient to enable a customer to make an informed decision as to whether to permit the Company to use its CPNI. At a minimum, such notification must include a definition of CPNI and description of the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses and deny or withdraw access to the CPNI at any time. The notification must advise the customer of the precise steps the customer must take to grant or deny access to CPNI, and state that a denial of approval will not affect the provision of any services to which the customer subscribes. The Company's notification must be proximate to any solicitation for the use of CPNI.

The Company's CPNI Procedures set forth the use of Opt-out and/or Opt-in approvals, and outline all FCC requirements regarding methods of delivery, timing of response and content requirements.

Company's CPNI Safeguards

The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company has established procedures for the training of its personnel. Employees have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Procedures describe the disciplinary process related to noncompliance with CPNI obligations. Refresher training courses are scheduled as needed.

The Company's CPNI Procedures and/or employee manuals contain express disciplinary procedures applicable to employees who violate Company policies, including CPNI policies, which can include termination of employment.

The Company maintains a written record of its sales and marketing campaigns that use CPNI, including a description of each campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign, and the specific products and services offered as part of the campaign. The Company maintains these records for a period of at least one year.

The Company has established a supervisory review process regarding Company compliance with the FCC's CPNI rules. The Company's supervisory process ensures compliance with the FCC's rules on outbound marketing situations, and the Company maintains records of compliance with these rules for a period of at least one year. The Company's procedures require that all sales personnel obtain supervisory approval of any proposed outbound marketing request.

The Company has appointed a management employee that has been named as the CPNI Compliance Officer to assure internal compliance with CPNI rules. In addition, the company's CEO/corporate officer is responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting such certification and

accompanying statement of how the company complies with the FCC's CPNI rules to the FCC by March 1.

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-store visit.

The Company only discloses call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the carrier asking for readily available biographical information or account information. If a customer does not provide a password, Company only discloses call detail information by sending it to an address of record or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without Company's assistance, then Company is permitted to discuss the call detail information provided by the customer.

The Company has established a system of passwords and password protection. For a new customer (a customer that establishes service after the effective date of the new CPNI rules), Company requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Company must first authenticate the customer without the use of readily available biographical information or account information.

For accounts that are password protected, Company cannot obtain the password by asking for readily available biographical information or account information to prompt the customer for his password. A customer may also access call detail information by establishing an online account or by visiting a carrier's retail location. If a password is forgotten or lost, Company uses a back-up 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, the customer may still access call detail based on a customer-initiated telephone call, by asking Company to send the call detail information to an address of record or by the carrier calling the telephone number of record.

If a customer is able to provide to the Company, during a customer-initiated telephone call, all of the call detail information necessary to address a customer service issue (i.e., the telephone number called, when it was called, and if applicable, the amount charged for the call) then Company proceeds with its routine customer carrier procedures. Under these circumstances, Company may not disclose to the customer any call detail information about the customer account other than the call detail information that the customer provides without the customer first providing a password.

Company password-protects online access to all CPNI, call detail and non-call detail.

Company may provide customers with access to CPNI at a carrier's retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

Company notifies a customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed through a carrier-originated voicemail or text message to the telephone number of record, or by mail to the address of record.

In the event of a CPNI breach, Company delays customer notification of breaches until law enforcement has been notified of a CPNI breach. Company will notify law enforcement of a breach of its customers' CPNI within seven business days after making a reasonable determination of a breach by sending electronic notification through a central reporting facility to the United States Secret Service (USSS) and the FBI.
If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, that agency may direct Company not to disclose the breach for an initial 30-day period. The law enforcement agency must provide in writing to the carrier its initial direction and any subsequent direction.

Company, however, may immediately notify a customer or disclose the breach publicly after consultation with the relevant investigative agency, if Company believes there is an extraordinarily urgent need to notify a customer or class of customers to avoid immediate and irreparable harm.

Company maintains a record of any discovered breaches and notifications to the USSS and the FBI regarding those breaches, as well as the USSS and the FBI response to the notifications for a period of at least two year.

Actions Taken Against Data Brokers and Customer Complaints

Company has taken no actions against data brokers in the past year. Company has received no customer complaints in the past year concerning the unauthorized released of CPNI.