LHTC
LAUREL HIGHLAND
Telephone Company

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FCC Mail Room

February 17, 2012

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

RE: EB-06-36
CPNI Annual Certification

Dear Ms. Dortch:

Enclosed please find our company's annual CPNI certification. Additionally, a copy has been sent to Best Copy and Printing, Inc.

Please contact us at 724-593-2411 if you have any questions or require additional information.

Sincerely,

James J. Kail
President & CEO

CC: Best Copy & Printing, Inc.

No. of Copies rec'd 0+4
List ABCDE

4157 Main Street • P.O. Box 168 • Stahlstown, PA 15687 • Phone 724.593.2411 • Fax 724.593.2423 • www.lhtc.net
868 Indian Creek Valley Road • Indian Head, PA 15446 • Phone 724.455.2411 • Fax 724.455.2423

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

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

1. Date filed: February 17, 2012
2. Name of company(s) covered by this certification: Laurel Highland Telephone Company
3. Form 499 Filer ID: 809845
4. Name of signatory: James J. Kail
5. Title of signatory: President & CEO
6. Certification:

I, James J. Kail, 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 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. [NOTE: If you reply in the affirmative, please provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, please provide a summary of such complaints. This summary should include number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

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: _____

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

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

James J. Kail signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulation (CFR) Title §64.2009, on behalf of Laurel Highland Telephone Company. This Certificate of Compliance addresses the requirement of FCC's (CFR) Title 47 §64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 §64.2001 – .2011.

On behalf of the Company, I certify as follows:

1. I am the President & CEO of the Company. My business address is:

   4157 Main St. PO Box 168
   Stahlstown, PA 15687

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Commission's (FCC) rules relating to customer proprietary network information (CPNI).

3. The Company has established a system by which the status of a customers' approval for use of CPNI, as defined in 47 USA 222 (h) (1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of the applicable law has occurred.

4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Patricia A. Yoders, the Company's Customer Service Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The company maintains these records in its offices for a minimum of one year.

6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records for customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.

7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the Company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES (Cont'd.)

8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Patricia A. Yoders regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Patricia A. Yoders or I consult one or more of the following: the FCC's Compliance Guide, and if necessary, legal counsel. The Company's sale personnel must obtain supervisory approval from either Patricia A. Yoders or I regarding any proposed use of CPNI.

9. Further, both Patricia A. Yoders and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.

10. Patricia A. Yoders and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

11. Both Patricia A. Yoders and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customers' complaints, and an explanation of breaches.

Signature

Laurel Highland Telephone Company
Company

2/17/12
Date