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February 28, 2012

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

Filed Electronically Via ECFS

RE: Ridley Telephone Company, LLC
Customer Proprietary Network Information Certification
EB Docket No. 06-36

Dear Ms. Dortch:

Ridley Telephone Company, LLC, by its undersigned attorneys, hereby submits its 2011 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or patrick@crockerlawfirm.com.

Very truly yours,

CROCKER & CROCKER

Patrick D. Crocker

PDC/crg

Enclosures

cc: Best Copy and Print, Inc. (via e-mail 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 28, 2012

Name of Company Covered by this Certification: Ridley Telephone Company, LLC

Form 499 Filer ID: 822342

Name of Signatory: James J. Fiumara

Title of Signatory: Managing Member

I am the Managing Member of Ridley Telephone Company, LLC and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Ridley Telephone Company, LLC I have personal knowledge that Ridley Telephone Company, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Ridley Telephone Company, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Ridley Telephone Company, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2011. Ridley Telephone Company, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Ridley Telephone Company, LLC is taking to protect CPNI.

This Certification is dated this 28 day of February, 2012.

James J. Fiumara
Managing Member
Ridley Telephone Company, LLC

ACCOMPANYING STATEMENT

Ridley Telephone Company, LLC's ("Ridley") operating procedures ensure that Ridley is in compliance with the requirements set forth in the Commission's CPNI rules as set forth in 47 C.F.R. Part 64, Subpart U (the "**CPNI Rules**") as follows:

- Ridley's operating procedures prohibit the use, disclosure or release of CPNI, except as permitted or required under 47 U.S.C. § 222(d) and Rule 64.2005. Ridley does not use disclose or permit access to CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

- Ridley's operating procedures prohibit the use of CPNI in sales or marketing campaigns. Ridley does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" or "opt out" approval under the Commission's CPNI Rules. Ridley does not currently solicit "opt in" or "opt out" customer approval for the use or disclosure of CPNI.

- Ridley takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Ridley's operating procedures include safeguards designed to identify and protect against unauthorized use, disclosure or access to CPNI. Ridley authenticates a customer prior to disclosing CPNI based on customer-initiated telephone contact or an in-store visit.

- Ridley maintains a record of all instances where CPNI was disclosed or provided to third parties and where third parties were permitted access to CPNI. Records of all instances where CPNI was disclosed or provided to third parties, or where third parties were permitted access to CPNI, are maintained for a minimum of one year.

- Ridley does not release call detail CPNI over the telephone, based on customer-initiated telephone contact, unless the customer first provides a password that is not prompted by Ridley asking for readily available biographical information or account information or unless the customer is able to provide the relevant call detail information without Ridley assistance. If a customer does not provide a password and is not able to provide the relevant call detail information without Ridley assistance, Ridley only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Ridley provides customers with access to CPNI at Ridley's retail locations only if the customer presents a valid photo ID and the valid photo ID matches an authorized name on the customer account. If a customer is not able to provide a valid photo ID, he or she may instead provide the account password in the same manner required for customer-initiated telephone contact. If a customer is not able to provide a valid photo ID or account password in connection with an in person inquiry, Ridley only discloses call detail CPNI by sending it to an address of record or by calling the customer at the telephone number of record.

- Ridley has established a system of passwords and password protection. For a new customer establishing service, Ridley requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, Ridley must first authenticate the customer without the use of readily available biographical information or account information, for example by calling the customer at the telephone Number of record or by using a personal identification number (PIN) or similar method to authenticate a customer.

- If a customer password is forgotten or lost, Ridley uses a backup 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 or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on a customer-initiated telephone call by asking Ridley to send the call detail information to an address of record or by Ridley calling the customer at the telephone number of record. If a customer does not want to establish a password or if a password is lost or forgotten without subsequent authentication of the customer, the customer may only access call detail information based on personal inquiry at a retail location by providing a valid photo ID that matches an authorized name on the customer account or by asking Ridley to send the call detail information to an address of record or by Ridley calling the customer at the telephone number of record.

- Ridley has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication, address of record or other critical account information is created or changed.

- Ridley does not currently provide online account access to customers.

- All Ridley employees with access to or a need to use CPNI have been trained regarding Ridley's operating procedures and as to when they are and are not authorized to use, disclose or permit access to CPNI. Ridley's employees have been trained regarding the types of information that constitute CPNI and Ridley's safeguards (such as employee restrictions, password protection, supervisory review, etc.) applicable to Ridley's handling of CPNI. Ridley's employee manual includes a disciplinary policy requiring compliance with Ridley's operating procedures and sets forth penalties for non-compliance, up to and including termination of employment.

- Ridley has appointed a compliance officer and established a supervisory review process regarding Ridley's compliance with the Commission's CPNI Rules. Ridley's operating policies require that employees confer with the compliance officer if they are unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI. Ridley's operating policies require that the compliance officer confer with Ridley's legal counsel if he or she is unsure about any circumstances or situations involving the potential use, disclosure or release of CPNI.

- Ridley's compliance officer has personal knowledge of Ridley's operating procedures and is authorized, as an agent of Ridley, to sign and file an annual CPNI compliance certification with the Commission.

- All Ridley employees and the compliance officer are trained to identify and protect against activity that is indicative of pretexting. All Ridley employees and the compliance officer are required to report any breach or potential breach of CPNI safeguards and/or any customer complaints regarding CPNI. In the event of a CPNI breach, Ridley's operating procedures require compliance with the Commission's CPNI Rules regarding notice to law enforcement and customers. Ridley must maintain records of any discovered breaches and notifications to the Secret Service and the FBI regarding those breaches, as well as the Secret Service and the FBI responses to such notifications, for a period of at least two years.