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February 28, 2012

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of South Carolina Net, Inc. d/b/a Spirit Communications (Long Distance Operations) (499 Filer ID # 809084), please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

Jean Langkop
Authorized Representative of
South Carolina Net, Inc.

JL/pjf

Attachments

cc: Best Copy and Printing, Inc. (via email FCC@BCPIWEB.COM)
Ms. Julie R. Cathcart, South Carolina Net, Inc.

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

Date executed: February 27, 2012

Name of company covered by this certification: South Carolina Net, Inc. d/b/a Spirit Communications (Long Distance Operations)

Form 499 Filer ID: 809084

Name of signatory: Robert Keane

Title of signatory: President and Chief Executive Officer

I, Robert Keane, 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 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 by pretexters to access the CPNI of the Company's customers and has not had to take any actions against data brokers.

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 for 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 RM Keane

Attachments: Accompanying Statement explaining CPNI procedures

ACCOMPANYING STATEMENT

This statement explains how Spirit Communications's ("the Company") procedures ensure compliance with the FCC rules on CPNI and FCC requirements for the safeguarding of such customer information.

The Company has chosen to prohibit the use or disclosure of CPNI for marketing purposes by itself and between its affiliates. If CPNI is to be used for its sales and marketing campaigns in the future, the required notice and opt-out approval process will be conducted as required, and safeguards for its use will be implemented in accordance with 47 C.F.R. §64.2009.

The Company has a written CPNI Policy that explains what CPNI is, when it may be used without customer approval, and when customer approval is required prior to CPNI being used, disclosed or accessed for marketing purposes.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains CPNI records in accordance with FCC rules, including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years.

The Company has internal procedures in place to educate its employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent. Employee disclosure of CPNI is only in accordance with the law and the FCC rules. In accordance with express Company Policy described in the CPNI Policy, any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.

The Company will require express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes, although it is currently the Company's policy not to use, release or disclose CPNI for marketing.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F.R. §64.2010. Prior to the disclosure of CPNI, customers initiating calls to or visiting the Company's offices are properly authenticated. Passwords and password back-up authentication procedures for lost or forgotten passwords have been implemented in accordance with §64.2010(e). Call detail information is only disclosed 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 the customer does not provide a password, call detail information is only provided by sending it to the customer's address of record or by calling the customer at their telephone number of record. If the customer is able to provide call detail information to the Company during a customer-initiated call without the Company's assistance, then the Company is permitted to discuss that call detail information provided by the customer. Prior to the Company disclosing CPNI to a customer visiting any of its retail offices in person, the customer must present a valid photo ID matching the customer's account information.

Currently customers do not have online access to their accounts. If that changes in the future, the method for customers to access their CPNI online will be established in compliance with §64.2010(d).

The Company has implemented procedures to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed. If notice is mailed regarding a change to the address of record, the notice is not sent to the new address but to the prior address of record. Such notice does not reveal the changed information.

In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement (i.e, United States Secret service (USSS) and the Federal Bureau of Investigation (FBI)) and customers. Records of any CPNI breach and notifications to law enforcement, as well as law enforcement's responses are maintained for a period of at least two years.