

# WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.  
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET  
MONTGOMERY, ALABAMA 36104  
TEL. 334.265.1500

DANA H. BILLINGSLEY

[dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

MAILING ADDRESS  
POST OFFICE BOX 830  
36101-0830  
FAX 334.265.0319

February 29, 2012

## Via Electronic Comment Filing System

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

**Re: Hayneville Fiber Transport, Inc. d/b/a Camellia Communications' Annual  
47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI)  
Compliance Certification  
EB Docket No. 06-36**

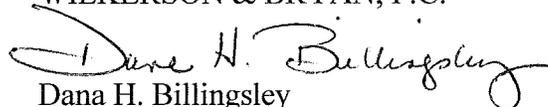
Dear Ms. Dortch:

On behalf of Hayneville Fiber Transport, Inc. d/b/a Camellia Communications (hereinafter, "Hayneville Fiber"), please find attached the annual CPNI Compliance Certification ("Certification") for Hayneville Fiber for the year 2011 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date. Simultaneously, Hayneville Fiber has also provided one copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley  
*Attorney for Hayneville Fiber Transport, Inc. d/b/a  
Camellia Communications.*  
Wilkerson & Bryan, P.C.  
405 South Hull Street  
Montgomery, Alabama 36104  
Telephone: (334) 265-1500  
Facsimile: (334) 265-0319  
Email: [dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

Enclosure

cc: Evelyn Causey  
Best Copy and Printing, Inc.

Hayneville Fiber Transport, Inc. d/b/a

Post Office Box 129  
180 Greenville Bypass  
Greenville, AL 36037



Greenville: 334-371-3000  
Fort Deposit: 334-404-4000  
Fax: 334-371-3001

*Local Service, Long Distance, Internet/DSL*

**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: Hayneville Fiber Transport, Inc. d/b/a Camellia Communications

Form 499 Filer ID: 820213

Name of signatory: Evelyn Causey

Title of signatory: CFO

In response to the Federal Communication Commission's ("Commission"), Hayneville Fiber Transport, Inc. d/b/a Camellia Communications states as follows:

I, Evelyn Causey, 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 Customer Proprietary Network Information ("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 that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

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 in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 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 Evelyn Causey

Hayneville Fiber Transport, Inc. d/b/a

Post Office Box 129  
180 Greenville Bypass  
Greenville, AL 36037



Greenville: 334-371-3000  
Fort Deposit: 334-404-4000  
Fax: 334-371-3001

*Local Service, Long Distance, Internet/DSL*

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
HAYNEVILLE FIBER TRANSPORT, INC. D/B/A CAMELLIA  
COMMUNICATIONS**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Hayneville Fiber Transport, Inc. d/b/a Camellia Communications (hereinafter, "Hayneville Fiber") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Hayneville Fiber:

1. I have personal knowledge that Hayneville Fiber has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Hayneville Fiber obtains written approval for the use of its customers' CPNI and that Hayneville Fiber has notified its customers of their right to restrict Hayneville Fiber's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Hayneville Fiber has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Hayneville Fiber has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Hayneville Fiber has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Hayneville Fiber implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.

5. I have personal knowledge that Hayneville Fiber maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer 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 part of the campaign. Hayneville Fiber retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Hayneville Fiber has established a supervisory review process regarding Hayneville Fiber's compliance with the Federal Communications Commission's rules for outbound marketing situations and that the company maintains records of such compliance for a minimum period of one (1) year. Hayneville Fiber'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.

7. I have personal knowledge that Hayneville Fiber has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Hayneville Fiber, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Hayneville Fiber to enforcement action.

Executed on this 28 day of February, 2012.

HAYNEVILLE FIBER TRANSPORT, INC. D/B/A  
CAMELLIA COMMUNICATIONS

By: Evelyn Causey  
Evelyn Causey  
CFO