BINGHAM

Jean L. Kiddoo
Brett P. Ferenchak
jean.kiddoo@bingham.com
brett.ferenchak@bingham.com

February 29, 2012

Via ECFS

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

Re: Minnesota Independent Equal Access Corporation
(Form 499 Filer ID 803187)

2011 CPNI Compliance Certification
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Minnesota Independent Equal Access Corporation, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's CPNI Certification for calendar year 2011.

Respectfully submitted,

Brett P Ferenchak

Jean L. Kiddoo
Brett P. Ferenchak

Counsel for Minnesota Independent Equal Access Corporation

Enclosure

cc: Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

Beijing
Boston
Frankfurt
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T +1.202.373.6000
F +1.202.373.6001
bingham.com

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 Filed: February 29, 2012

Name of company covered by this certification: Minnesota Independent Equal Access Corporation

Form 499 FilerID: 803187

Name of signatory: Scott E. Beer

Title of signatory: General Counsel and Secretary

Certification:

I, Scott Beer, 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.

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 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 Scott E. Beer/eaz
Scott E. Beer, General Counsel and Secretary

Attachment: Accompanying Statement explaining CPNI procedures

MINNESOTA INDEPENDENT EQUAL ACCESS CORPORATION

STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

Minnesota Independent Equal Access Corporation (MIEAC) is a provider of centralized equal access in Minnesota and portions of North Dakota.

MIEAC does not use or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third party access to CPNI for marketing-related purposes.

Consistent with the Commission's rules, MIEAC uses, discloses and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of MIEAC, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

MIEAC has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

MIEAC has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, MIEAC will notify affected customers. MEAC will maintain a record of any CPNI-related breaches for a period of at least two years.

MIEAC provides training concerning CPNI procedures. All employees of MIEAC are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Company. Employees of MIEAC who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

MIEAC discloses or releases call detail information to customers during customer-initiated telephone contacts only when the customer provides a pre-established password. If the customer does not provide a password, call detail information is released only by sending it to the customer's address of record or by the carrier calling the customer at the telephone number of record.

MIEAC permits customers to establish online accounts, but requires that an appropriate password be furnished by the customer before he or she can access any CPNI in his or her online account. Passwords may not be based upon readily obtainable biographical information or account information.

MIEAC has adopted a policy that it does not and will not use, disclose or permit access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company.