



"the Pager Professionals"

Kanoy Communications

- PAGERS
- TWO-WAY RADIOS
- REPEATER SERVICE
- CELLULAR PHONES

February 28, 2012

Received & Inspected

MAR 06 2012

FCC Mail Room

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

Re: Annual 64 2009(e) CPNI Certification for Year Ending December 31, 2011
EB Docket No. 06-36

Dear Ms. Dortch:

In compliance with the Federal Communications Commission's public notice DA 06-258 (released on February 2, 2006), Kanoy Telecom, Inc., hereby files its report providing its annual CPNI officer certification and accompanying statement explaining how its operating procedures ensure compliance with the FCC's CPNI rules.

Should you have any further questions or if you would need any additional information, please feel free to contact us at the phone number provided herein or you may reach me via email at fcc.gov@kanoytelecom.us.

Sincerely,

Edward M. Gore Jr.,
President

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Year Ending December 31, 2011

Date of Filing: February 28, 2012

Name of company covered by this certification: Kanoy Telecom, Inc.

Form 499 Filer ID: #825756

Name of signatory: Edward M. Gore, Jr.

Title of signatory: President

I, Edward M. Gore, Jr. do hereby certify that I am an officer of Kanoy Telecom, Inc., (hereinafter referred to as the "Company") and acting as an agent of the company do hereby certify that to the best of my knowledge and belief, the Company has established operating procedures that adequately 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 in detail how Kanoy Telecom has implemented such procedures to ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Additionally, let it be known that the Company has not taken any actions, proceedings or filed any petitions at the state commission, with the court system, or at the Commission against data brokers in the past year.

Further, the Company has not received any customer complaints in the past year concerning the mis-handling or unauthorized release of our customers CPNI information.

Officers Signature: Edward M. Gore, Jr., President
Date: 2012-02-28

Operating Procedures for Compliance with CPNI Regulations

Kanoy Telecom, Inc. is a small one-way paging service provider which caters largely to the public safety sector in the coastal North Carolina region. With that being said, management has made every effort to minimize the amount of call and non-call CPNI data that is collected and/or compiled.

Each employee of Kanoy Telecom, Inc. (the "Company") has a duty to protect the confidentiality of its customer proprietary network information ("CPNI"), as defined in 47 U.S.C. §222(f). A violation of the Company's procedures would result in a fitting disciplinary action up to and including immediate dismissal.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes: (1) to bill or collect payment for Company services or (2) to protect the rights of property of the Company or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any additional purposes.

Employees are only permitted to disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting such information is the person listed in Company records as the authorized contact for the account. For residential customers, the validation process includes asking the person requesting the CPNI for an account password and only discloses the CPNI information if the correct password is provided. No Company employees are permitted to disclose CPNI to a person other than the customer unless the customer provides written authorization affirmatively requesting that the customers CPNI be disclosed to that person.

In the case of a request for CPNI disclosure, the Company shall maintain a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to a customers CPNI (hereinafter referred to as the "record"). An employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the customers record the name and address of the third party, a description of the reasons for the disclosure, the specific information disclosed, and any written authorization from the customer granting permission to disclose. This record is maintained by the Company for a minimum period of one year.

All Company employees are required to sign a Confidentiality Agreement which obligates them to protect the customers information. Employees are also required to sign a separate statement that they will comply with CPNI rules contained in the Company's employee handbook. All Employees are subject to live monitoring to ensure compliance and as necessary receive periodic reminders via e-mail or direct instruction from management.

It is the Company's policy to not use CPNI for any prohibited sales or marketing activity. However, should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Company has sent customers the notices required by 47 C.F.R. §64.2008 and receive the customer opt-in or opt-out approvals required for such use of CPNI. If the company changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign, the Company will establish a system which meets the requirements of 47 C.F.R. §64.209 ©) and (d).