

OFFICER'S CPNI COMPLIANCE CERTIFICATE**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: November 29, 2012.

Name of company(s) covered by this certification: Shen-Heights T.V. Associates, Inc. ("Shen-Heights")

Form 499 Filer ID: 829480

Name of signatory: Martin Brophy

Title of signatory: Martin Brophy

I, Martin Brophy, 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.*

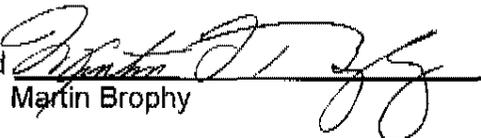
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules

The company has not taken 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 has not received any customer complaints in the past year concerning the unauthorized release of CPNI (e.g. instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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 be subject to enforcement action.

Signed


Martin Brophy

**ATTACHMENT 1
TO CPNI COMPLIANCE CERTIFICATE**

Statement Regarding CPNI Operating Procedures

Shen-Heights' Confidential Customer Information Procedures ensure that Shen-Heights will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Shen-Heights Confidential Customer Information Procedures are:

- A requirement that Shen-Heights have at all times a Supervisor to supervise the implementation of Confidential Customer Information Procedures. The Supervisor in charge of Customer Confidential Information is Martin Brophy.
- Protections to ensure that Shen-Heights employees do not misuse Customer Confidential Information, including CPNI.
- Protections to ensure that Shen-Heights employees do not have access to CPNI for billing or customer service issues. Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI implemented by Shen-Heights agent who is the only party with day-to-day access to CPNI and who provides customer support and billing including:
 - Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
 - A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
 - A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A disciplinary process for misuse of any Confidential Customer Information, including CPNI, with discipline up to and including termination of employment for violations.
- Detailed filing, notice and recordkeeping requirements regarding breaches of Confidential Customer Information, including CPNI.
- Procedures to be followed in the event of a breach of Confidential Customer Information, including CPNI.

Shen-Heights does not use, disclose or allow access to CPNI for any purpose that would require customer approval under 47 U.S.C. § 222 or the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations.