PEOPLES
TELECOMMUNICATIONS, LLC.

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

Annual 64.2009(e) CPNI Certification for 2012

Date filed: January, 2013

Name of company covered by this certification: Peoples Telecommunications, LLC

Form 499 Filer ID: 805944

Name of signatory: Kathy Billinger

Title of signatory: CEO/General manager

I, 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. This statement also explains what steps the company is taking to protect CPNI.

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 in the past year. The company does not have any information with respect to the processes pretexters are using to attempt to access CPNI .

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 Kathy Billinger

Attachment: Accompanying Statement explaining CPNI procedures

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PEOPLES
TELECOMMUNICATIONS, LLC.

Accompanying Statement
To 2012 CPNI Annual Certificate
Peoples Telecommunications, LLC

Peoples Telecommunications, LLC ("Peoples") adheres to all CPNI rules found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations (Sections 64.2001 – 64.2011) concerning the proper use of our customers' CPNI.

Peoples has established procedures requiring company personnel to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Employees must properly authenticate a customer prior to disclosing CPNI.

Peoples has implemented a detailed Policies and Procedures Manual on the use, and safeguarding, of CPNI. The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and signed by all company employees. In addition, all current Peoples employees have been thoroughly trained on the use, and safeguarding, of CPNI and all new employees receive similar training upon hire.

Peoples does not use CPNI for marketing purposes in a manner that requires written opt-in or opt-out approval. Accordingly, Peoples' personnel are trained not to use CPNI for such purposes.

To further protect our customer's privacy, we have implemented all of the safeguards contained in Section 64.2009, except for those related to marketing using opt-in and opt-out since we don't use either. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Peoples Telecom's policies and procedures to ensure compliance with the federal CPNI rules.

Signed Kathy Billinger

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