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January 17, 2013

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

Re: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2012

East Kentucky Network, LLC d/b/a Appalachian Wireless

Dear Ms. Dortch:

On behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification with accompanying statement covering calendar year 2012.

Should any questions arise regarding this submission, kindly contact the undersigned.

Very truly yours,

Pamela L. Gist

Pamela L. Gist

Enclosure
cc: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification covering 2012

Date filed: January 17, 2013

Name of company covered by this certification: East Kentucky Network, LLC
d/b/a Appalachian Wireless
101 Technology Trail
Ivel, Kentucky 41642

Form 499 Filer ID: 802104

Name of signing officer: Gerald F. Robinette

Title of signatory: Chief Executive Officer

CERTIFICATION

I, Gerald F. Robinette, hereby 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 Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

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 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.

Name: Gerald F. Robinette
Title: Chief Executive Officer
Date: January 17, 2013

Attachment: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Company Name ("Carrier"): East Kentucky Network, LLC d/b/a Appalachian Wireless

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier does not use its customers' CPNI in its or its affiliates' sales and marketing campaigns. Carrier does not conduct outbound marketing to its customers. Carrier does not provide an opt-in election to its customers; controls are established to automatically designate all customers as selecting an opt-out election.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier has found that pretexters are continuing their attempts to access CPNI through phone calls and customer impersonation. Carrier's use of a password/pin-code to properly authenticate customers, plus additional verification procedures, protects CPNI.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2012, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No actions taken

- The following is a summary of all customer complaints received in 2012 regarding the unauthorized release of CPNI:

  - Number of customer complaints Carrier received in 2012 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: __0__

  - Category of complaint:

    __0__ Number of instances of improper access by employees

    __0__ Number of instances of improper disclosure to individuals not authorized to receive the information

    __0__ Number of instances of improper access to online information by individuals not authorized to view the information

    __0__ Number of other instances of improper access or disclosure