CHR Solutions

Austin, TX
5929 Balcones Drive, Suite 200
Austin, TX 78731-4280
Phone: 512.343.2544
Fax: 512.343.0119

February 8, 2013

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Personal Touch Communications, L.P., please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

Jean Langkop
Authorized Representative of
Personal Touch Communications, L.P.

JL/pjf

Attachment

cc: Ms. Karen Zimmerman, Personal Touch Communications, L.P.
Mr. Rocky Byrd, Personal Touch Communications, L.P.

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

Date: February 6, 2013

Name of company covered by this certification:	Personal Touch Communications, L.P.
Form 499 Filer ID:	820638
Name of signatory:	Karen Zimmerman
Title of signatory:	General Manager

I, Karen Zimmerman, 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.

The company has not taken any 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 is not aware of any attempts by pretexters to access the CPNI of company customers and therefore, has not had to take any actions against data brokers.

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 _____

Attachment: Accompanying Statement

Personal Touch Communications, L/P.

ACCOMPANYING STATEMENT

This statement explains how Person Touch Communications' ("the Company") procedures ensure compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information.

The Company has chosen to prohibit the use or release or CPNI for marketing purposes by itself and between its affiliates.

The Company has a written CPNI policy that explains what CPNI is, when it may be used without customer approval, and when customer approval is required prior to CPNI being used, disclosed or accessed. The Company has trained its employees about CPNI and when they are and are not authorized to use CPNI. The Company's CPNI policy describes the disciplinary process related to noncompliance with CPNI obligations, and possible disciplinary action up to and including termination of employment.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any CPNI breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules including records of any discovered breaches. Records of any CPNI breach and notifications to law enforcement and customers, as well as law enforcement's responses are maintained for a period of at least two years.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010, including, but not limited to the following: Although the Company has not implemented passwords for authentication purposes, call detail information is not discussed with a customer on a customer-initiated call unless the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide sufficient information about the call in question, call detail information is shared only by (1) calling the customer back at the telephone number of record; or (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D. matching the name on the customer's account. On a customer-initiated call, non-call detail information can only be discussed after the customer is authenticated using standard procedures, such as personally-identifiable information noted on the account records.

The Company's online system is designed to protect customers' CPNI from unauthorized access in accordance with § 64.2010(c) of the Commission's regulations. Prior to allowing the customer online access to CPNI related to their telecommunications account, the customer is authenticated without the use of readily available biographical

information or account information. Once authenticated, a customer can only access his/her online account through the use of a password that is not prompted by the Company asking for readily available biographical information or account information.

The Company has implemented procedures to immediately notify a customer whenever a password, back-up means of authentication or address of record is created or changed.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, the Company has not and does not plan to release CPNI to any third parties for marketing purposes.

In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement (i.e., United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI)) and customers.