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February 14, 2013

**ELECTRONIC FILING**

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

**Re: EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), Bluegrass Telephone Company, Inc. hereby submits its annual CPNI Certification for 2013.

Please feel free to contact me if you require additional information.

Very truly yours,

STOLL KEENON OGDEN PLLC

/s/ Douglas F. Brent

Douglas F. Brent

cc: Telecommunications Consumers Division, Enforcement Bureau (via ECFS)
Best Copy and Printing, Inc. (fcc@bcpiweb.com)

**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 filed: February 11, 2013

Name of company covered by this certification: Bluegrass Telephone Company, Inc. d/b/a Kentucky Telephone

Form 499 Filer ID: 825723

Name of signatory: Joseph McClung

Title of signatory: President

I, Joseph McClung, 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 against data brokers in the past year. The company has no information with respect to the processes pretexters are using to attempt to access CPNI. The company does not provide online access to CPNI, and views this practice as a protective measure.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____

BLUEGRASS TELEPHONE COMPANY, INC. D/B/A KENTUCKY TELEPHONE ("KTC") STATEMENT OF CPNI PROCEDURES AND COMPLIANCE

- **Definition.** Customer Proprietary Network Information ("CPNI") includes information such as the phone numbers called by our customers, the frequency, duration, and timing of such calls, and any services purchased by our customers, such as call waiting. It also includes call detail records. KTC does not use CPNI to market telecommunications or information services. KTC does not provide online access to customer calling records or other CPNI. However, KTC employees must exercise caution and responsibility to protect our customers' CPNI when dealing with customers by telephone or in the customer service center.

- **Safeguarding CPNI.** KTC Employees must 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 based on customer-initiated telephone contact or an in-store visit.

- **Telephone access to CPNI.** KTC employees may only disclose call detail information over the telephone, based on customer-initiated telephone contact, by sending it to the customer's address of record, or, by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without assistance, then the employee is permitted to discuss the call detail information provided by the customer.

- **In-store access to CPNI.** KTC may disclose CPNI to a customer who, at a KTC's retail location, first presents a valid photo ID matching the customer's account information.

- **Notification of account changes.** KTC will notify customers immediately whenever an address of record is created or changed. This notification is not required when the customer initiates service. This notification may be through a voicemail or text message to the telephone number of record, or by mail to the address of record, and must not reveal the changed information or be sent to the new account information.

- **Breach of CPNI.** "Breach" is any unauthorized access to CPNI. KTC shall notify law enforcement of a breach of its customers' CPNI. As provided by FCC rules, KTC shall not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or the FCC's rules, until it has completed the process of notifying law enforcement pursuant. As soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, KTC shall electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) through a central reporting facility maintained by the FCC at http://www.fcc.gov/eb/cpni. Notwithstanding any state law to the contrary, KTC shall not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided below. After KTC has completed the process of notifying law enforcement, it shall notify its customers of a breach of those customers' CPNI.

- **Disclosure to Avoid Harm.** If there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed (see above paragraph), in order to avoid immediate and irreparable harm, KTC will notify its affected customers only after consultation with our counsel and the relevant investigating agency. KTC employees shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

- **Records Maintained.** KTC will maintain a record for two years of any breaches discovered, notifications made to the USSS and the FBI, and notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.