

# WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.  
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET  
MONTGOMERY, ALABAMA 36104  
TEL. 334.265.1500

MAILING ADDRESS  
POST OFFICE BOX 830  
36101-0830  
FAX 334.265.0319

DANA H. BILLINGSLEY

[dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

February 14, 2013

## Via Electronic Comment Filing System

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

**Re: Millry Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer  
Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Millry Telephone Company, Inc. ("Millry Telephone"), please find attached the annual CPNI Compliance Certification for Millry Telephone for the year 2012 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Dana H. Billingsley  
*Attorney for Millry Telephone Company, Inc.*  
Wilkerson & Bryan, P.C.  
405 South Hull Street  
Montgomery, Alabama 36104  
Telephone: (334) 265-1500  
Facsimile: (334) 265-0319  
Email: [dana@wilkersonbryan.com](mailto:dana@wilkersonbryan.com)

Enclosure

cc: Bobby Williams

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

**EB Docket 06-36**

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

Date filed: February 14, 2013

Name of company covered by this certification: Millry Telephone Company, Inc.

Form 499 Filer ID: 803640

Name of signatory: Bobby Williams

Title of signatory: Vice-President

In response to the Federal Communications Commission's ("Commission") rules and policies, Millry Telephone Company, Inc. states as follows:

I, Bobby Williams, 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 Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

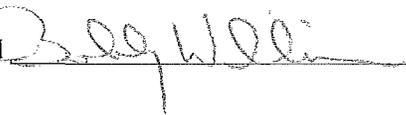
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping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

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 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 CFR § 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



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
MILLRY TELEPHONE COMPANY, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Millry Telephone Company, Inc. (hereinafter "Millry Telephone") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Millry Telephone:

1. I have personal knowledge that Millry Telephone has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Millry Telephone obtains written approval for the use of its customers' CPNI and that Millry Telephone has notified its customers of their right to restrict Millry Telephone's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Millry Telephone has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Millry Telephone has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.*, and that Millry Telephone has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Millry Telephone implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Millry Telephone maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Millry Telephone retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Millry Telephone has established a supervisory review process regarding Millry Telephone's compliance with the Federal Communications Commission's rules for outbound marketing situations and that the company maintains records of such compliance for a minimum period of one (1) year. Millry Telephone's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Millry Telephone has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Millry Telephone, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Millry Telephone to enforcement action.

Executed on this 13 day of February, 2013.

MILLRY TELEPHONE COMPANY, INC.

By: Bobby Williams

Printed: Bobby Williams

As Its: Vice-President