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

**EB Docket 06-36**

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

Name of company covered by this certification: Flower City Paging, Inc.

Form 499 Filer ID: 812145

Name of signatory: J. Scott Martin

Title of signatory: President

I, J. Scott Martin, certify that I am an officer of the company named above (the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that, to the best of my knowledge, information and belief, are adequate to ensure compliance with the Commission's CPNI rules as I understand them. *See* 47 C.F.R. § 64.2001 *et seq*. The basis for my certification is summarized below:

The paging service provided by the Company is billed to the customer monthly on a flat-rate basis. As a result, the Company collects at most only minimal information that could be considered CPNI under the FCC's rules. Any use or disclosure of or provision of access to customer-specific information by the Company, whether CPNI or not, requires my approval.

The Company uses, discloses or provides access to CPNI only for the purpose of initiating, rendering, billing or collecting for the paging service provided by the Company. There is one circumstance under which the Company discloses CPNI to third party vendors as an incident of providing its paging service, *i.e.,* to the company that physically prints and stuffs the Company's customer bills. In that case the Company requires the third party vendor to observe the Company's CPNI obligations and to limit its use of CPNI solely to the purpose for which it is permitted access. The Company also discloses CPNI to law enforcement personnel in compliance with subpoenas.

Except as described in the preceding paragraph, the Company does not disclose or provide access to CPNI to any third parties for any purpose.

The Company does not employ any third parties to market paging service on its behalf. To the extent any marketing of the Company's paging service is done, it is done through direct sales by one or more employees of the Company. Such employees may maintain customer account information for customer service purposes and for the purpose of selling additions to services already subscribed to by customers, or adjuncts to basic services already subscribed to by the customers.

The Company has reviewed and modified its CPNI policies and practices as deemed necessary in order to comply with the CPNI rule changes adopted by the FCC in 2007.

The Company did not take any actions against data brokers (*i.e.,* institute proceedings or file petitions at either state commissions, the court system, or at the FCC) during 2012.

The Company did not experience any incidents of "pretexting" during 2012.

The Company did not receive any customer complaints during 2012 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 FCC. The Company also acknowledges that false statements and misrepresentations to the FCC are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

J. Scott Martin
Date: 2/25/13