

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

**EB Docket 06-36**

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

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

Date filed: 2-28-13

Name of company covered by this certification: Grafton Technologies, Inc.

Form 499 Filer ID: 822458

Name of signatory: Susan Hamilton

Title of signatory: Vice President

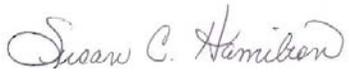
I, Susan Hamilton, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et 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 (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 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 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   
\_\_\_\_\_  
Susan Hamilton, Vice President  
Grafton Technologies, Inc.  
301 Commerce Blvd.  
Jerseyville, IL 62052; 618-639-4841

cc: (1) Best Copy and Printing, Inc.

Attachment: Accompanying Statement explaining CPNI procedures

# Certification Statement

February 28, 2013

## Grafton Technologies, Inc. CPNI Operating Procedures

Grafton Technologies, Inc. (GTI) has provided training to existing employees and will provide training to all new employees on the proper use and disclosure of (CPNI). Records of the training material and documentation of the attendance is kept on file. Any employee's noncompliance of GTI's CPNI policies will be reported and appropriate disciplinary steps taken.

Notification letters were mailed to address of record to all customers explaining their rights regarding CPNI. Customers were asked to contact office to establish security information to protect their data. Customers that didn't respond to mailing were then contacted again via a letter to address of record with randomly selected security information for their account. Customers are allowed to change security information after verification of customer. When customer's CPNI's data is requested either by phone or in person customer, employees verify by procedures noted in their CPNI training manual. After a change or requested of CPNI data as occurred, the customer is then notified by mailed to address of record a notification of change, and then a log is made in billing system. All new customer's are asked to establish security information for CPNI. The customer is also given the letter describing CPNI. GTI's billing company is also compliant with the CPNI regulations.

In the past year, no action taken against data brokers and no customer complaints received concerning unauthorized release of CPNI.