

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: March 19, 2013

Name of company covered by this certification: QualityLife Intergovernmental Agency

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Name of signatory: Keith A. Mobley

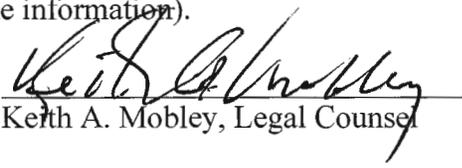
Title of signatory: Legal Counsel

I, Keith A. Mobley, certify that I serve as legal counsel of the agency named above, and acting as an agent of the entity, that I have personal knowledge that the entity has or will establish 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 (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 
Keith A. Mobley, Legal Counsel

**CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)
OPERATING PROCEDURES
for
QUALITYLIFE INTERGOVERNMENTAL AGENCY**

Background

47 C.F.R. § 64.2009(e) states: “A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.”

Although QualityLife Intergovernmental Agency (QIA) is strictly a “middle-mile” provider and does not have access to Customer Proprietary Network Information (CPNI), we have been advised by legal counsel to prepare and file a certificate as required by the reference above.

QIA was established as an economic development initiative of the City of The Dalles and Wasco County, Oregon. A fiber optic loop was built around the City of The Dalles to serve the city, county, local Internet Service Providers, and users desiring access to dark fiber. QIA has no employees and contracts with various providers who manage, operate and maintain the fiber system.

Requirement for Operating Procedures

In the event QIA comes into possession of customer proprietary network information in the future, the safeguards required by 47 C.F.R. § 64.2009 must immediately be put in place.