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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2013

Date filed: 2/05/14

Name of company covered by this certification: State Telephone Long Distance Company, Inc.

Form 499 Filer ID: 816106

Name of signatory: Mark R. Evans

Title of signatory: Vice-President

I, Mark R. Evans, 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 (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: Mark R. Evans – Vice-President

Customer Proprietary Network Information Procedures

Effective 1/01/06

Every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunication carriers, equipment manufacturers, and customers, including telecommunication carriers reselling telecommunications services provided by a telecommunications carrier.

Process –

1. All disclosures or uses of Customer Proprietary Network Information (CPNI) are to be approved by the customer except for valid law enforcement requests. Lacking customer approval any request to utilize CPNI requires approval of the Vice-President or Assistant Vice-President to determine validity.

2. All disclosures of CPNI for law enforcement and marketing campaigns will be listed in the CPNI notebook along with backup documentations maintained by the Vice-President or Assistant Vice-President. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.

3. The President or Vice-President will utilize lists of customers for which maintains the opt-in or opt-out approvals including history of notices to customers. All outbound marketing request campaigns need to be approved by the Vice-President or Assistant Vice-President.

4. In instances of Opt-out mechanisms that do not work properly the Vice-President or Assistant Vice-President are required to notify the FCC within five business days in writing. The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

5. On or about the first of each year all personnel with customer data access will review the CPNI requirements covered in the FCC Small Entity Compliance Guide.

6. Annually the Vice-President or Assistant Vice-President will certify personal knowledge that the company had been in compliance with the above operating procedures and that those procedures are adequate to ensure we are in compliance with Federal laws and requirements.