



# NAVIGATOR

Telecommunications

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*Records  
Public Service Commission*

February 22, 2012

Executive Secretary  
Missouri Public Service Commission  
P.O. Box 360  
200 Madison, Suite 100  
Jefferson City, MO 65102-0537

RE: Annual CPNI Certification – Navigator Telecommunications, LLC.

Dear Executive Secretary,

Enclosed for filing with the Missouri Public Service Commission are an original and three (3) copies of the annual CPNI certification of Navigator Telecommunications, LLC. as required by 4 CSR 240-33.160(7)(F).

Please feel free to contact me at the number listed below should you require additional information regarding this filing. Thank you for your assistance in this matter.

Sincerely,

Michael McAlister  
General Counsel  
[mike@navtel.com](mailto:mike@navtel.com)

Enclosures

## **Annual CPNI Compliance Certificate**

Name of company covered by this certification: Navigator Telecommunications, LLC.

Date: February 22, 2012

I, Kenrick L. LeDoux, certify that I am an officer of the company named above, and in my capacity have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160(7).

- A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Navigator takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Navigator will not disclose call detail information over the telephone, based on customer-initiated telephone contact, but will only disclose call detail information by sending it to the customer's address of record. A customer appearing in person must present a valid photo ID matching the customer's account information before any disclosure of CPNI to that customer. Navigator does not allow online access to CPNI.

- B. The company has implemented personnel training as to when they are and are not authorized to use CPNI including an express disciplinary process.

All company employees, upon hiring and in their orientation, are instructed about the confidential and protected nature of CPNI, and the fact that it is only to be accessed for purposes of providing services to customers. This policy is stressed in all employees' initial training, and is revisited periodically in ongoing training and instruction. Employee policy provided to all employees instructs that violation of company policy regarding the use or disclosure of customer information will subject an employee to disciplinary action up to and including discharge.

- C. Navigator policy and practice is to use CPNI solely for the purpose of providing telecommunications services to its customers, along with billing, directory services, E911, repair, and other such permitted uses associated with the provisioning of those telecommunications services as provided in applicable Commission rules. Specifically, Navigator does not use, disclose, or permit access to CPNI for any marketing purposes whatsoever.

- D. It is not the policy or practice of Navigator or its Sales and Marketing Departments or personnel to use, disclose or permit access to CPNI for any sales or marketing campaigns, and such policy and practice cannot be altered except by express supervisory approval of company senior management, which would require implementation of appropriate customer approval solicitation and tracking systems, along with customer notification and opt-in/opt-out mechanisms as mandated by applicable Commission rules. Company senior management, as well as sales and operations management and personnel, are aware of these rules and requirements. Given the company's size and target markets for its services, Navigator has never utilized CPNI for marketing purposes, and consciously and intentionally instituted its policy and practice of keeping CPNI strictly confidential as a basic aspect of its internal business practices.
- E. Because Navigator does not use, disclose, or permit access to CPNI for marketing or other purposes not connected with the provisioning of services to its customers, Navigator has not solicited approval from its customers to use CPNI for those purposes. Likewise, because company policy and practice is to not use CPNI for any purposes which require obtaining and maintaining the status of customer approval for such uses, Navigator has had no need to implement a system or procedures regarding customer opt-out mechanisms. Instead, the company-wide rule is consistently applied reflecting that no approval has either been solicited by the company or granted by the customer for use of CPNI for marketing purposes.
- F. Because the company has not experienced any breaches of its policies regarding the use of CPNI, the company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sell CPNI.
- G. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
- H. The company does not share CPNI with joint venture partners or independent contractors (except for billing and collection of services).

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Annual Customer Proprietary Network     )  
Information Certification pursuant to     )  
Missouri PSC Rule 4 CSR 240-33.160(7)   )

Filing No. BCPN-2012-

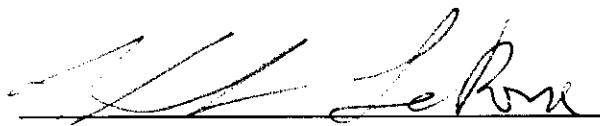
**AFFIDAVIT OF KENRICK L. LEDOUX**

State of Arkansas)

) ss

County of Pulaski)

Kenrick L. LeDoux, V.P. Engineering and Chief Technical Officer, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying CPNI compliance certificate and that the facts therein are true and correct to the best of his knowledge and belief.



Kenrick L. LeDoux  
V.P.Engineering and Chief Technical Officer  
Phone: (501) 954-4000  
ken@navtel.com

Subscribed and affirmed before me this 22nd day of February 2012 .

I am commissioned as a notary public within the County of Pulaski, State of Arkansas and my commission expires on \_\_\_\_\_.

\_\_\_\_\_  
Notary Public