



May 1, 2006

**SENT VIA FEDERAL EXPRESS**

Ms. Blanca S. Bayo  
Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 060158-TL  
Order No. PSC-06-0258-PAA-TL  
Investigation of Protection of Customer Proprietary  
Network Information "(CPNI)" by Incumbent Local Exchange Companies

Dear Ms. Bayo:

Smart City Telecommunications LLC d/b/a Smart City Telecom hereby submits this letter in response to the above referenced Florida Public Service Commission Order dated March 27, 2006, and the ordered requirement for all incumbent local exchange companies to report to the Commission about the additional measures we have undertaken and implemented to secure CPNI.

Please be advised, as of this date, Smart City Telecom has not used nor plans to use CPNI for marketing purposes. For marketing purposes, Smart City Telecom has only used customer billing name and address and/or telephone number information without any disaggregation or refinement based on CPNI.

The above being said, the following describes what additional measures Smart City Telecom has undertaken, implemented, or will soon be implementing to ensure that CPNI, if ever used, will be secured:

- In January 2006, following Smart City Telecom's submission to the Federal Communications Commission of its Statement of FCC CPNI Rule Compliance and Annual Certification thereof, we distributed with all employee paychecks a written Bulletin regarding privacy and the treatment and handling of CPNI.
- Smart City Telecom recently completed a comprehensive update of its Customer Proprietary Network Information ("CPNI") Protection Policy, which will be reissued to all existing employees and a copy thereof provided to all new employees during their orientation.

DOCUMENT NUMBER-DATE

03791 MAY-1 8

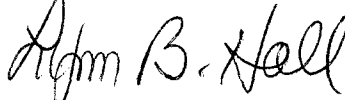
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- On April 27 and 28, 2006, Smart City Telecom's external telecommunications consulting firm, John Staurulakis, Inc. ("JSI"), conducted two (2) days of in-depth CPNI Compliance Training for all Regulatory, Marketing, Sales, Customer Service/Care, Repair, Help Desk and Support, Engineering, and Information Technology employees, each of whom received a CPNI Compliance reference binder. JSI will follow-up with a Train-the-Trainers session (to be scheduled) consisting of even more comprehensive training for a designated group of Smart City Telecom trainers who, on an ongoing basis, will train new Smart City employees as well as provide annual refresher CPNI Compliance Training in-house.
- Smart City Telecom is in the process of drafting an Opt-Out Letter to send to all of our existing customers.

Should you have any questions regarding the information provided herein, please contact me at (407) 828-6730.

Sincerely,

SMART CITY TELECOM



Lynn B. Hall  
Director - Contracts and Tariffs