

Annual Customer Proprietary Network Information (CPNI) Compliance Certificate

(A copy of a company's FCC CPNI filing will suffice for the required descriptions for all items, unless H.2 is chosen, then an additional description must be attached.)

12. The company affirms having 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).

Indicate which of the following apply with Y (Yes) or N (No).

Y

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. Attached is a brief description of the company's system.

Y

B. The company has implemented personnel training as to when personnel are or are not authorized to use CPNI including an express disciplinary process. Attached is a brief description of the company's training and disciplinary process.

Y

C. The company maintains records for at least one year of sales and marketing campaigns of its own, its agents, affiliates, joint venture partners and any independent contractors, that use its customers' CPNI. Such records 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. Attached is a brief description of the company's record maintenance system.

Y

D. The company has a supervisory review process for outbound marketing situations. Attached is a brief description of the company's review process.

Y

E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly. Attached is a brief description of the company's procedures.

F. Actions Taken - Select one of the options from the drop-down box below (by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

G. Complaints Received - Select one of the options from the drop-down box below (by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

H. Sharing CPNI Information - Select one of the options from the drop-down box below (by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company does not share CPNI with joint venture partners or independent contractors (except for billing and collection services)

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For use when filing under seal.

Annual Report of IBFA Acquisition Company, LLC dba Farm Bureau Connection
for the calendar year of January 1 - December 31, 2010

VERIFICATION

The foregoing report must be verified by the oath of the President, Treasurer, General Manager or Receiver of the company. The oath required may be taken before any person authorized to administer an oath (Notary Public) by the laws of the State in which the same is taken.

OATH

State Of California }
County Of Los Angeles } ss:

Boaz Yung makes oath and says that
Name of Affiant (Company Official/Representative)

s/he is Vice President
Official Title of the Affiant (Company Official/Representative)

of IBFA Acquisition Company, LLC dba Farm Bureau Connection
Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 353 Sacramento Street, Suite 1500, San Francisco, CA 94111
Address and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, 2) examined (and updated as applicable) the company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct, and 3) read the CPNI Certification, chosen the applicable alternatives and attached all required documentation, which is a true and correct description of the company's CPNI safeguards.

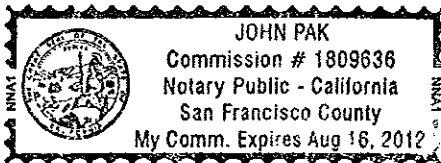
from January 1, 2010, to and including December 31, 2010
Month/Day Year Month/Day Year

[Signature]
Signature of Affiant (Company Official/Representative)

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 29th day of March, 2011.

My Commission expires _____



Signature of Notary Public



Jurat Certificate California only

State of California

County of San Francisco

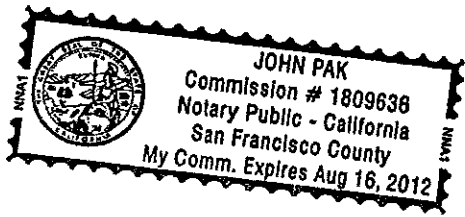
Subscribed and sworn to (or affirmed) before me on this 29th

day of March, 2011, by Boaz Yung

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Place Seal Here

Signature John Pak



**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is IBFA Acquisition Company, LLC (hereafter referred to as "IBFA Acquisition Company") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. IBFA Acquisition Company follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or IBFA Acquisition Company. However, IBFA Acquisition Company cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, IBFA Acquisition Company shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - B. IBFA Acquisition Company shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, IBFA Acquisition Company shall not wait the additional seven (7) days to notify its customers if IBFA Acquisition Company determines there is an immediate risk of irreparable harm to the customers.
 - D. IBFA Acquisition Company shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
 - A. Specifically, IBFA Acquisition Company shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 1. When the customer has pre-established a password.
 2. When the information requested by the customer is to be sent to the customer's address of record, or

3. When IBFA Acquisition Company calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.
- B. IBFA Acquisition Company may use CPNI for the following purposes:
- To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive , or the unlawful use of, or subscription to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To market services formerly known as adjunct-to-basic services; and
 - To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
4. Prior to allowing access to Customers' individually identifiable CPNI to IBFA Acquisition Company's joint venturers or independent contractors, IBFA Acquisition Company will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, IBFA Acquisition Company requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
 5. IBFA Acquisition Company requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
 6. IBFA Acquisition Company does not market, share or otherwise sell CPNI information to any third party.
 7. IBFA Acquisition Company maintains a record of its own and its affiliates' sales and marketing campaigns that use IBFA Acquisition Company's customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- A. Prior commencement of a sales or marketing campaign that utilizes CPNI, IBFA Acquisition Company establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by IBFA Acquisition Company.
- Prior to any solicitation for customer approval, IBFA Acquisition Company will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.

- IBFA Acquisition Company will use opt-in approval for any instance in which IBFA Acquisition Company must obtain customer approval prior to using, disclosing, or permitting access to CPNI.
 - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
 - Records of approvals are maintained for at least one year.
 - IBFA Acquisition Company provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The content of IBFA Acquisition Company's CPNI notices comply with FCC rule 64.2008 (c).
8. IBFA Acquisition Company has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
 9. IBFA Acquisition Company has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, IBFA Acquisition Company's sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by The General Counsel of IBFA Acquisition Company.
 10. IBFA Acquisition Company notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
 11. IBFA Acquisition Company may negotiate alternative authentication procedures for services that IBFA Acquisition Company provides to business customers that have a dedicated account representative and a contract that specifically addresses IBFA Acquisition Company's protection of CPNI.
 12. IBFA Acquisition Company is prepared to provide written notice within five business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that consumer's inability to opt-in is more than an anomaly.

ANNUAL 47 C.F.R. S: 64.2010 (e) CPNI CERTIFICATION FOR 2011
EB Docket 06-36

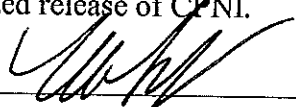
Date Filed: January 28, 2011
Name of Company: IBFA Acquisition Company, LLC
Form 499 Filer ID: 825416
Name of Signatory: Baldwin Yung
Title of Signatory: President

I, Baldwin Yung, 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. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed:  _____