



GVNW CONSULTING, INC.

1001 WATER STREET, STE. A-100  
KERRVILLE, TX 78028  
TEL 830.896.5200  
FAX 830.896.5202

January 30, 2018

*Filed Electronically Via ECFS*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for  
Baca Valley Telephone Company, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Baca Valley Telephone Company, Inc. (499 Filer ID No. 803250) for 2017 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 830-895-7221 or [cspears@gvnw.com](mailto:cspears@gvnw.com) with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Courtney Spears". The signature is written in a cursive, flowing style.

Courtney Spears  
Authorized Representative for  
Baca Valley Telephone Company, Inc.

cc: Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

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

EB Docket 06-36

Annual Section 64.2009(e) CPNI Certification for 2017

1. Date filed: January 30, 2018
2. Name of Company: Baca Valley Telephone Company, Inc.
3. Form 499 Filer ID: 803250
4. Name of signatory: Paul J. Briesh, Jr.
5. Title of signatory: Vice President & General Manager
6. Certification:

I, Paul J. Briesh, Jr., 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 (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

The Company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Company does not have any information that pretexters have attempted to gain access to CPNI.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals, or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed   
Paul J. Briesh, Jr., Vice President & General Manager

Attachment: Statement of CPNI Compliance and Procedures

BACA VALLEY TELEPHONE COMPANY, INC.  
STATEMENT OF COMPLIANCE and PROCEDURES  
For The Year Ending 2017  
Form 499 Filer ID: 803250

1. This Statement of Compliance for Baca Valley Telephone Company, Inc. ("Baca Valley" or "the Company") is attached to and referenced within the Company's 2017 Annual CPNI Certification.
2. Baca Valley has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release, or usage of CPNI.
3. The Company has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all Company employees.
4. For the year ending 2017, Baca Valley is not aware of any incidence involving the access, breach, release, or usage of its CPNI by any unauthorized person or entity; *i.e.*, data brokers or pretexters.
5. For the year ending 2017, Baca Valley has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.