



GVNW CONSULTING, INC.

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

February 12, 2019

*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  
Coleman County Telephone Cooperative, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Coleman County Telephone Cooperative, Inc. (499 Filer ID No. 808521) for 2018 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 fluid and cursive, with the first name "Courtney" being more prominent than the last name "Spears".

Courtney Spears  
Authorized Representative for  
Coleman County Telephone Cooperative, 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 2018

1. Date filed: February 11, 2019
2. Name of Company: Coleman County Telephone Cooperative, Inc.
3. Form 499 Filer ID: 808521
4. Name of signatory: Tim J. Humpert
5. Title of signatory: General Manager / Chief Financial Officer
6. Certification:

I, Tim J. Humpert, certify that I am an officer of the Cooperative named above, and acting as an agent of the Cooperative, that I have personal knowledge that the Cooperative 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.*

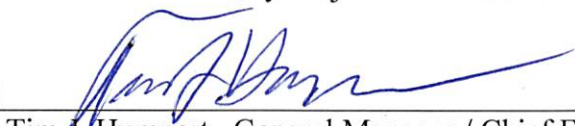
Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

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

The Cooperative 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 Cooperative 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 Cooperative 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



Tim J. Humpert, General Manager / Chief Financial Officer

Attachment: Statement of CPNI Compliance and Procedures

**COLEMAN COUNTY TELEPHONE COOPERATIVE, INC.**  
**STATEMENT OF COMPLIANCE and PROCEDURES**  
**For The Year Ending 2018**  
**Form 499 Filer ID: 808521**

1. This Statement of Compliance for Coleman County Telephone Cooperative, Inc. ("Coleman County" or "the Cooperative") is attached to and referenced within the Cooperative's 2018 Annual CPNI Certification.
2. Coleman County 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 Cooperative 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 Cooperative employees.
4. For the year ending 2018, Coleman County 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 2018, Coleman County has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.