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February 14, 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  
St. Paul Cooperative Telephone Association**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of St. Paul Cooperative Telephone Association (499 Filer ID No. 802479) 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 written in a cursive, flowing style.

Courtney Spears  
Authorized Representative for  
St. Paul Cooperative Telephone Association

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 14<sup>th</sup> 2019
2. Name of Company: St. Paul Cooperative Telephone Association
3. Form 499 Filer ID: 802479
4. Name of signatory: Nick L. Schneider
5. Title of signatory: Secretary / Treasurer
6. Certification:

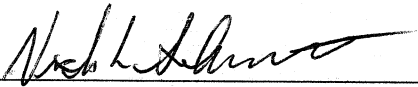
I, Nick L. Schneider, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *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   
Nick L. Schneider, Secretary / Treasurer

Attachment: Statement of CPNI Compliance and Procedures

ST. PAUL COOPERATIVE TELEPHONE ASSOCIATION  
STATEMENT OF COMPLIANCE and PROCEDURES  
For The Year Ending 2018  
Form 499 Filer ID: 802479

This accompanying statement explains how the operating procedures of St. Paul Cooperative Telephone Association (“St. Paul” or “the Company”) are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations and as referenced within the Company’s 2018 Annual CPNI Certification.

St. Paul adheres to all CPNI rules as stated in 47 C.F.R. §§ 64.2001 – 64.2011 concerning the proper use of a customer’s CPNI. Specifically, this statement for use of CPNI meets all the requirements as listed in 47 C.F.R. § 64.2008. To further protect the customer’s privacy, all the safeguards required by 47 C.F.R. § 64.2009 have been implemented. This includes:

- The implementation of a system by which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of the Company’s, and the Company’s affiliates’ sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of an annual certification by a corporate officer with personal knowledge of the Company’s policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification to the Federal Communications Commission of any instance where opt-out mechanisms do not work properly to such a degree that consumers’ inability to opt-out is more than an anomaly.

St. Paul has its updated CPNI Manual available on file at its business office for further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.