



DENNY BERGSTROM
GENERAL MANAGER/EXECUTIVE VICE PRESIDENT

February 14, 2019

BY ELECTRONIC FILING

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

RE: Certification of CPNI Filing (December 31, 2018)
EB-Docket No. 06-36

Dear Ms. Dortch:

In accordance with the Public Notice, DA 06-223, issued by the Enforcement Bureau on January 30, 2006, and as required by 47 C.F.R. Section 64.2009(e), Dell Telephone Cooperative, Inc. hereby files its most recent certification regarding its compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. Part 64, Subpart U.

If you have any questions, please feel free to contact me at 915-964-2352.

Sincerely,



Denny Bergstrom
General Manager/EVP

DELL TELEPHONE COOPERATIVE, INC.
610 SOUTH MAIN STREET • P.O. BOX 67
DELL CITY, TEXAS 79837
TEL. 915/964-2352 • FAX 915/964-2402

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: **February 13, 2019**
2. Name of Cooperative: **Dell Telephone Cooperative, Inc.**
3. Form 499 Filer ID: **808560**
4. Name of signatory: **Denny Bergstrom**
5. Title of signatory: **General Manager / Executive Vice President**
6. Certification:

I, Denny Bergstrom, 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 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.

The company *has not* taken actions (i.e., 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 company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 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



Denny Bergstrom, General Manager / Executive Vice President

Attachment: Statement of CPNI Compliance and Procedures

DELL TELEPHONE COOPERATIVE, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For The Year Ending 2018
Form 499 Filer ID: 808560

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