



February 15, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2019
FCC Docket EB 06-36
EB 06-TC-060
Plains Cooperative Telephone Association, Inc.

In accordance with the Public Notice issued by the Enforcement Bureau on February 2, 2006 (DA 06-258), please find attached Plains Cooperative Telephone Association, Inc.'s annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have questions regarding this filing, please direct them to the undersigned at 970-358-4211 or email ronnypuckett@plainstel.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronny Puckett", is written over a horizontal line.

Ronny Puckett, General Manager
Plains Cooperative Telephone Assn., Inc.

PLAINS COOPERATIVE TELEPHONE ASSOCIATION, INC.
P.O. BOX 123 • JOES, COLORADO 80822 • TELEPHONE 970-358-4211 • FAX 970-358-4505
www.plainstel.com

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: March 1, 2019

Name of company covered by this certification: Plains Cooperative Telephone Association, Inc.

Form 499 Filer ID: 805395

Name of signatory: Linda Sackett

Title of signatory: Secretary

I, Linda Sackett, 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, see Attachment A.

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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



By: Linda Sackett, Secretary

Date: February 15, 2019

Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of **Plains Cooperative Telephone Association, Inc.** (Form 499 Filer ID No. 805395) (the Company) ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information (“CPNI”).

The Company has established a system by which the status of a customer’s approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company’s CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company takes its statutory responsibility to protect its customers’ CPNI seriously and therefore does not sell, rent, or otherwise disclose customers’ CPNI to other entities. Further, Plains Cooperative Telephone Association does not currently use, nor allow its affiliates to use, any customers’ CPNI in marketing activities. Any request for CPNI is immediately forwarded to Ronny Puckett, the General Manager of Plains Cooperative Telephone Association. Plains Cooperative Telephone Association employees have been educated about CPNI, federal regulations and Plains Cooperative Telephone Association’s statutory responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal. Further, Plains Cooperative Telephone Association does not use, disclose, or permit access to customers’ CPNI for the purposes of identifying customers placing calls to competing carriers.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor’s signature and date. This log is maintained for a minimum of two years.