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Date: 2-11-2019

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

RE: Certification of CPNI Filing, March 1, 2019  
EB Docket 06-36  
The Tri-County Telephone Association, Inc.

In accordance with the Public Notice issued by the Enforcement Bureau on January 28, 2012 (DA 11-159), please find attached The Tri-County 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) if applicable.

Should you have any questions regarding this filing, please direct them to the undersigned at (620) 767- 5153 or email [djones@tctainc.net](mailto:djones@tctainc.net).

Sincerely,

Dale L. Jones

The Tri-County Telephone Association, Inc.

Cc: Best Copy and Printing, Inc. (1)

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Randy J. Parker, Vice President  
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**CEO**

Dale L. Jones

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019

Date filed: 2-11-2019

Name of company covered by this certification: The Tri-County Telephone Association, Inc.

Form 499 Filer ID: 804633

Name of signatory: Dale L. Jones

Title of signatory: C.E.O.

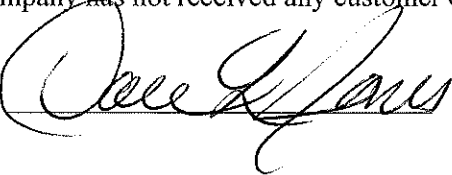
I, Dales L. Jones, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et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

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in black ink, appearing to read "Dale L. Jones", is written over a horizontal line.

**Attachment A**  
**Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of The Tri-County Telephone Association, Inc. ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of 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 maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

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.