

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

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 2/23/2018
2. Name of company(s) covered by this certification: Citizens Telephone Cooperative, Inc.
3. Form 499 Filer ID: 801393
4. Name of signatory: Dennis L Bachman
5. Title of signatory: Chief Executive Officer
6. Certification:

I, Dennis L Bachman, 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, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Cooperative *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 Cooperative *has not* received customer complaints in the past year concerning the unauthorized release of CPNI

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 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  CEO

**Attachments:** Accompanying Statement explaining CPNI procedures