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EB DOCKET NO. 06-36

February 25, 2019

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

Reference: Annual 47 C.F.R. § 64.2009(e), EB Docket 06-36, Certification of CPNI Filing of Blackfoot Telephone Cooperative, Inc.

Dear Ms. Dortch:

Enclosed is the annual CPNI compliance certificate of Blackfoot Telephone Cooperative, Inc. (499 Filer ID 803277).

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads 'Michelle Owens'.

Michelle Owens
Regulatory Specialist/Paralegal
Phone: 406-541-5131
E-mail: mowens@blackfoot.com

Blackfoot Telephone Cooperative, Inc.
CPNI Certification and Statement
February 8, 2019



Before the
Federal Communications Commission
Washington, D.C. 20554

CPNI Compliance Certification)	EB Docket No. 06-36
As Required by FCC Enforcement)	Blackfoot Telephone Cooperative, Inc.
Bureau, DA 10-91)	
)	499 Filer ID 803277

**BLACKFOOT TELEPHONE COOPERATIVE, INC.
ANNUAL 47 C.F.R. § 64.2009(e) CERTIFICATION OF CPNI COMPLIANCE
FOR THE 2018 CALENDAR YEAR**

1. Date filed: February 8, 2019.
2. Name of company(s) covered by this certification: Blackfoot Telephone Cooperative, Inc.
3. Form 499 Filer ID: 803277
4. Name of signatory: Stacey Mueller
5. Title of signatory: Chief Financial Officer
6. Certification:

I, Stacey Mueller, 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 company took no 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 2018 calendar year.

The company received no customer complaints in the 2018 calendar year concerning the unauthorized release of CPNI.

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.



Stacey Mueller
Chief Financial Officer

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers
 Summary of customer complaints

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STATEMENT EXPLAINING CPNI PROCEDURES

1. Customer accounts prominently displays “CPNI” so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict the use of their CPNI. When CSSRs receive a call from a customer, CSSRs authenticate the customer and, after the customer is authenticated, ask the customer for permission to access the customer’s account information.
2. Notice regarding customer CPNI rights and the company’s duty to protect CPNI is provided orally as well as provided on the company’s website. In addition, the notice is also printed once every two years as a message on the customer’s billing statement.
3. Customers are given an opportunity to “opt-in” to CPNI usage beginning with the install of service. Additionally, a customer may change or revoke the customer’s prior approval at any time.
4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally, procedures are documented and readily available to all employees on the company’s internal website.
5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under FCC rules. All employees and/or entities with such access operate under policies and/or a contract requiring nondisclosure of confidential information.

6. All marketing campaigns and materials are reviewed and approved by a supervisory panel. The panel's review includes any use of CPNI data in any marketing effort. Please note that as of this time the company has not used CPNI data in this manner, but the proper safeguards are in place should it be used.

7. Improper use or disclosure of CPNI is subject to the company's policies and procedures—including but not limited to disciplinary policies—as outlined in its policy manual. The policy manual is readily accessible by all employees.

8. Valid Photo Identification is required when customers come into the company's office requesting assistance/access to any account information.

9. Call detail information is only provided in a customer initiated call where the customer identifies the call record consistent with 47 CFR § 64.2010(b) and FCC 07-22. Absent identification of information as required by 47 CFR § 64.2010 and FCC rule, call detail information is not released during a customer initiated call. Employees have been instructed to either mail the call detail information to the customer's address of record, call the customer at the telephone number of record, or refer the customer to the e-bill site.

10. The company does not currently, and has no plans to, provide CPNI to a third party for marketing.

11. The company complies with the record-keeping requirements in 47 CFR Part 64, Subpart U.

12. Customer initiated changes in passwords or addresses result in a generic notification to the customer using the address of record consistent with FCC rules.

13. On-line access to CPNI is compliant with the FCC password requirements.

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BLACKFOOT TELEPHONE COOPERATIVE, INC.
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ACTIONS AGAINST DATA BROKERS

The company took no 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 2018 calendar year.

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SUMMARY OF CUSTOMER COMPLAINTS

The company received no customer complaints in the 2018 calendar year concerning the unauthorized release of CPNI.