

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 27, 2019

Name of Company: Valley Telephone Cooperative, Inc.

Form 499 Filer ID: 802410

Name of signatory: Dave Osborn

Title of signatory: CEO

I, Dave Osborn, 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 cooperative's procedures ensure that the cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

The cooperative has not taken any actions (*i.e.*, proceedings instituted, or petitions filed by the cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The cooperative does not have any information that pretexters have attempted to gain access to CPNI.

The cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

Signed: 

Dave Osborn

Attachment: Accompanying Statement of CPNI Compliance and Procedures

VALLEY TELEPHONE COOPERATIVE, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For Year Ending 2018
Form 499 Filer ID: 802410

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