



**MULBERRY
COOPERATIVE
TELEPHONE CO., INC.**

123 South Glick Street • Mulberry, IN 46058-0370

February 27, 2018

Ms. Marlene H. Dortch
Federal Communications Commission (FCC)
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for electronic filing in compliance with the FCC customer proprietary network information (CPNI) rules under 47 C.F.R. § 64.2009(e) is the 2017 CPNI annual compliance certification and accompanying statement of operating procedures for Mulberry Cooperative Telephone Company, Inc. (499 Filer ID: 808299).

Please contact me if you have any questions or concerns regarding this filing.

Respectfully Submitted,

Randy Maish
CEO
randy@mintel.net
765-296-2885

Attachments

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 27, 2018

Name of company covered by this certification: Mulberry Cooperative Telephone Co., Inc.

Form 499 Filer ID: 808299

Name of signatory: Randy Maish

Title of signatory: CEO

I, Randy Maish, 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 attached accompanying statement of operating procedures.*

The company has not taken 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.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed: Randy Maish

MULBERRY COOPERATIVE TELEPHONE CO., INC.

116 S Glick Street
Mulberry, IN 46058

MULBERRY COOPERATIVE TELEPHONE CO., INC (499 ID: 808299)

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

Accompanying Statement of Compliance

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017 Statement of Compliance and Operating Procedures:

1. I, Randy Maish, certify that I am the CEO and Officer of the Mulberry Cooperative Telephone Company, Inc. ("Company"), 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 Customer Proprietary Network Information ("CPNI") rules.
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I assist the CPNI Compliance Officer overseeing compliance with the FCC rules relating to CPNI.
3. The Company has an established system which the status of customer's approval for the use of CPNI can clearly be established prior to the use of CPNI.
4. The Company has an updated CPNI policy manual and trains its personnel on company and FCC policies, definitions, authorized and unauthorized use of, reporting requirements, documentation, and disciplinary processes of CPNI and established by the FCC.
5. It is the Company's policy to maintain records of its own sales and marketing campaigns that use CPNI. The Company maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company maintains records of all instances where CPNI was disclosed or provided to third parties.
6. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI. The purpose of the review process is to ensure compliance with all rules prior to using CPNI for a purpose which customer approval is required. Company personnel, prior to use of CPNI, must first consult with myself or the CPNI Compliance Officer, regarding the lawfulness of using CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is permissible, either I or the CPNI Compliance Officer consults current FCC CPNI regulations, the FCC's compliance guidelines, and if necessary, consultant and/or legal council. The Company's personnel must obtain approval regarding any proposed use of CPNI.

7. The CPNI Compliance Officer and I personally oversee the use of opt-in, opt-out or any other approval requirements, disclosure requirements and notice requirements as required by FCC regulations. We also review all notices required by the FCC to maintain compliance.

8. The CPNI Compliance Officer and I ensure the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

9. It is the Company's policy to maintain records of Customer approval for use of CPNI, Opt-In/Opt-Out, Customer notifications, and breach logs as required by the FCC regulations.

Certified By: *Randy Maish*
Randy Maish, CEO

February 27, 2018