BLACKFOOT
Telecommunications Group

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EB DOCKET NO. 06-36

January 30, 2015

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,

Michelle Owens

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Carrier and Regulatory Specialist
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Blackfoot Telephone Cooperative | Blackfoot Communications | Fremont Communications | TeleSphere Software

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

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

BLACKFOOT TELEPHONE COOPERATIVE, INC.
ANNUAL 47 C.F.R. § 64.2009(E) CERTIFICATION OF CPNI COMPLIANCE
FOR THE 2014 CALENDAR YEAR

1. Blackfoot Telephone Cooperative, Inc. ("BTC") (499 Filer ID 803277) is submitting its annual compliance certificate in as required in EB Docket No. 06-36, pursuant to section 64.2009(e) of the Federal Communication Commission's rules.

2. I am the Vice President – General Counsel, for BTC. I make this certification from my personal knowledge of the CPNI procedures and policies of BTC.

3. BTC expects to use CPNI for marketing purposes and has noticed customers under the "opt-out" provisions of the rules. BTC's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, BTC's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for marketing purposes, BTC has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.

4. On behalf of BTC, I certify that to the best of my knowledge, pursuant to the Commission's rules, BTC has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

Jason Williams
Vice President – General Counsel

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OPERATING PROCEDURES STATEMENT

1. Customer account prominently displays "**CPNI**" so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers they ask for customer permission to access account information.

2. Customers are given an opportunity to "opt-out" of CPNI usage beginning with the install of service. Additionally, customers may "opt-out" at any time.

3. Notice regarding customer CPNI rights and BTC's duty to protect CPNI is provided to all new and existing customers in the printed telephone directory. In addition, the notice is also printed once every two years as a message on the customer's billing statement.

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 Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.

6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time BTC 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 BTC's work rules and 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 business office requesting assistance/access to any account information.

9. Call detail is only provided in a customer initiated call where the customer identifies the call record consistent with the FCC 07-22. Absent that information call detail will not be released during a customer initiated call. BTC employees have been instructed to either mail the detail to the address of record or refer the customer to the e-bill site.

10. BTC does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.

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

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

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CUSTOMER COMPLAINTS

1. There were no reported CPNI breaches during the 2014 calendar year.

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Bureau, DA 10-91	)	499 Filer ID 803277

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PRETEXTING ACTIVITIES

1. During the 2014 calendar year no pretexting activities were noted, so no actions were undertaken to address such activities.