MOSS-ADAMS LLP
Certified Public Accountants | Business Consultants

WWW.MOSSADAMS.COM
5929 Balcones Drive, Suite 200
Austin, TX 78731
T (512) 343-2544 F (512) 343-0119

February 10, 2015

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of West Plains Telecommunications, Inc., please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to 47 C.F.R. §64.2009(e).

Please contact me at 512-652-7725 if you have any questions or need further information.

Sincerely,

Lynette Hampton
Authorized Representative for
West Plains Telecommunications, Inc.

LH/pjf

Attachment

cc: Mr. Sandy Vandevender, West Plains Telecommunications, Inc.

Praxity MEMBER
GLOBAL ALLIANCE OF INDEPENDENT FIRMS

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

Date filed: February 10, 2015

Name of company covered by this certification: **West Plains Telecommunications, Inc.**

Form 499 Filer ID: 801211

Name of signatory: Sandy Vandevender

Title of signatory: Chief Executive Officer

I, Sandy Vandevender, 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.

The company has not taken any 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 is not aware of any attempts by pretexters to access the CPNI of Company customers and therefore, has not had to take any actions against data brokers.

The company has not received any customer complaints in the past 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.

Signed _____

Attachment: Accompanying Statement explaining CPNI procedures

WEST PLAINS TELECOMMUNICATIONS, INC.
2015 CPNI Certification Covering 2014

ACCOMPANYING STATEMENT

This statement explains how procedures established by West Plains Telecommunications, Inc. ("the Company") ensure compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information.

Under the Company's operating procedures, disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 or the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies in compliance with § 64.2011 of the FCC's rules. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules, including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years.

Appropriate safeguards on the use and disclosure of CPNI have been implemented in accordance with C.F.R. §64. 2009 and §64.2010. The Company has internal procedures in place to educate our employees about when they are and are not authorized to access, use, and disclose CPNI. Employees with access to CPNI are aware of the FCC's CPNI rules and are prohibited from using, disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Company has a disciplinary policy in place and any employee that discloses, uses, or provides unauthorized access to CPNI in violation of federal regulations is subject to disciplinary action, and possible termination.

Employees are trained to properly authenticate a customer prior to discussing the account to determine if that person has authorization to access or make any changes to the account. Call detail information is not discussed with a customer unless the customer can provide their pre-established password, or the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide a password or sufficient information about the call in questions, call detail information can be shared only by (1) calling the customer back at the telephone number of record; (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D. It is the policy of the Company only to establish passwords and back-up authentication questions upon customer request. Passwords and back-up authentication questions cannot be based upon readily available biographical or account information. Non-call detail information can be discussed only after the customer is authenticated using standard procedures, such as personally-identifiable information noted on the account in instances where the customer has no password.

The Company has implemented procedures to immediately notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. A notice of the change is mailed to the customer's address of record within twenty-four hours of receiving an order for the change. If the change is to the address of record, the notice is mailed to the prior address of record.

The Company's customers who have online access to their accounts have been set up utilizing procedures established in accordance with § 64.2010(c) regarding the proper authentication of customers prior to allowing a customer online access to CPNI on their account. Once authenticated the customer is only able to obtain online access to CPNI related to the telecommunications service account through a password that is not prompted by the Company asking for readily available biographical information, or account information.

The Company provides notice to the customer of his or her right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Company is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Company.

The Company has established a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. The Company will maintain a record of their own and heir affiliates' sales and marketing campaigns that use their customers' CPNI, including a description of the campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign; and what products and services were offered as part of the campaign. This record shall be maintained for a minimum of one year. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval.

When an existing customer calls the Company to inquire about or order new, additional, or modified services (in-bound marketing), the Company may use the customer's CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by 64.2008(c) and §64.2008(f) of the FCC's rules and after the Company authenticates the customer.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Company has no joint venture partner and does not release CPNI to any third parties for marketing purposes.