NORTHERN TELEPHONE COOPERATIVE, INC.
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February 18, 2015

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

From: Northern Telephone Cooperative, Inc
PO Box 190
Sunburst, MT 59482

RE: EB Docket No. 06-36
Electronic CPNI Filing for the year ended Dec 31, 2014

Greetings,

The attached CPNI documents for Northern Telephone Cooperative, Inc., (Form 499 filer ID 803646), including CPNI compliance certification and accompanying statement, are being filed electronically using the ECFS system.

Thank you.

Michael D. Sheard
General Manager
Phone: 406-937-2114
E-mail: msheard@northerntel.net

Northern Telephone Cooperative, Inc.

STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

Prefatory Statement:

Northern Telephone Cooperative, Inc. will disclose CPNI to the customer, or another entity designated by the customer, only after receiving an appropriate request (verified appropriately); or in those instances where disclosure is permissible without customer approval; all in accordance with Section 64.2001 *et seq.* of the FCC's Rules and Regulations.

I. Customer Proprietary Network Information ("CPNI")

The law affords privacy protections for two kinds of information related to Northern Telephone Cooperative, Inc. as a telecommunications carrier: (1) information about the quantity, technical configuration, type, destination, location, and amount of a telecommunications service subscribed to by any customer, and (2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

That information, when matched to a name, address, and telephone number is known as "Customer Proprietary Network Information or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. (CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.)

II. Use of CPNI Is Restricted

Northern Telephone Cooperative, Inc. recognizes that CPNI privacy concerns have led Congress and the FCC to impose restrictions upon the use and

disclosure of CPNI, and upon the provision of access to it by individuals or entities inside and outside our company.

Northern Telephone Cooperative, Inc. has designated it's General Manager as the CPNI Compliance Officer responsible for: (1) communicating with our company attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; and (3) receiving, reviewing and resolving any questions or issues arising within our company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

III. Permissible Uses of CPNI

Northern Telephone Cooperative, Inc. employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the company, except as follows:

1. Northern Telephone Cooperative, Inc. may, after receiving an appropriate request from a customer (verified appropriately), disclose or provide customer's CPNI to any person or entity designated by the customer.

Disclosure based on a phone call inquiry may occur if:

1) Customer, or a customer-authorized entity, provides a pre-established password

2) Information is mailed to customer's address of record or

3) We call the telephone number of record with the requested information.

Disclosure based on a store visit requires an appropriate photo ID.

Disclosure is always permissible if given in writing, signed by the customer of record.

Disclosure based on an "on-line" visit requires the use of a secure password.

2. In the absence of an appropriate request from the customer, Northern Telephone Cooperative, Inc. may still provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. Northern Telephone Cooperative, Inc. may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, we may use the CPNI from our provision of local exchange service to a customer to inform the customer of new, additional or modified local exchange service offerings.

4. Northern Telephone Cooperative, Inc. and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

a. The FCC has noted the publishing of directories as an example of this permitted use.

b. The FCC has indicated that telecommunications carriers may use disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.

c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

5. Northern Telephone Cooperative, Inc., its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. Northern Telephone Cooperative, Inc. may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. Northern Telephone Cooperative, Inc. may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without the customer's approval, to provide customer premises

equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

8. If a customer subscribes to more than one category of service offered by Northern Telephone Cooperative, Inc., we are permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

If a customer does not subscribe to more than one offering, Northern Telephone Cooperative, Inc. is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth in Sections 64.2001 *et seq.* of the FCC's Rules.

9. When an existing customer (appropriately verified) calls or visits Northern Telephone Cooperative, Inc. to inquire about or order new, additional or modified services (in-bound marketing), we may use the customer's CPNI to assist the customer if we provide the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

10. Northern Telephone Cooperative, Inc. has adopted a policy that it does not and will not use, disclose, or permit access to CPNI in connection with company-initiated marketing of services to which a customer does not already subscribe. (out-bound marketing).]

IV. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by Northern Telephone Cooperative, Inc.'s CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

V. Disciplinary Procedures

Northern Telephone Cooperative, Inc. has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).

Steen Alme, President

Steen Alme, President
Northern Telephone Cooperative, Inc.

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014

Date filed: February 18th, 2015

Name of company covered by this certification: Northern Telephone Cooperative, Inc., including the wholly owned subsidiary Northern Communications, Inc.

Form 499 Filer ID: 803646

Name of signatory: Steen Alme

Title of signatory: President

I, Steen Alme, 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. § 64.200 1 *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 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.

Signed Steen Alme, President