



GVNW CONSULTING, INC.

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February 19, 2015

*Filed Electronically Via ECFS*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for  
Baca Valley Telephone Company, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Baca Valley Telephone Company, Inc. (499 Filer ID No. 803250) for 2014 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 830-895-7226 or [sgatto@gvnw.com](mailto:sgatto@gvnw.com) with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Gatto", is written over a light blue circular stamp.

Steve Gatto  
Authorized Representative for  
Baca Valley Telephone Company, Inc.

cc: Best Copy and Printing, Inc. (BCPI), [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014

Date filed: January 26, 2015

Name of Company: Baca Valley Telephone Company, Inc.

Form 499 Filer ID: 803250

Name of signatory: Paul J Briesch, Jr.

Title of signatory: Vice President and General Manager

I, Paul J. Briesch, Jr., 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 Statement of Compliance).

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

The company 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: 

Paul J. Briesch, Jr.

Attachment: Accompanying Statement of CPNI Compliance and Procedures

BACA VALLEY TELEPHONE COMPANY, INC.  
STATEMENT OF COMPLIANCE and PROCEDURES  
For Year Ending 2014  
Form 499 Filer ID: 803250

1. This Statement of Compliance for Baca Valley Telephone Company, Inc. ("Baca" or "the Company") is attached to and referenced within the Company's 2014 Annual CPNI Certification.
2. Baca 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 Company 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 company employees.
4. For year ending 2014, Baca 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 2014, Baca has not received any customer complaints concerning the unauthorized access, breach, release or usage of CPNI.