Founded in 1852
by Sidney Davy Miller

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February 20, 2015

EB Docket No. 06-36
Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W., Suite TW-A325
Washington, D.C. 20554

Dear Secretary Dortch,

In accordance with 47 CFR 64.2009(e), please find attached **Westphalia Telephone Company's** Annual Compliance Certificate for the previous calendar year, 2014. The Compliance Certificate includes Westphalia Telephone Company's:

- Statement explaining how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information (CPNI).

If you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Michael C. Rampe

Digitally signed by: Michael C. Rampe
DN: CN = Michael C. Rampe C = US O = Miller Canfield
Date: 2015.02.20 09:05:24 -04'00'

Michael C. Rampe

Enclosure

MCR/cla

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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 20, 2015

Name of Company covered by this certification: **Westphalia Telephone Company**

Form 499 Filer ID: 801771

Name of signatory: David A. Fox

Title of signatory: President

Certification:

I, David A. Fox, 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 (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (i.e. proceedings instituted or petitions filed 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 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

Compliance Statement Attachment

Statement Explaining How Operating Procedures Ensure Regulatory Compliance

1. I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the FCC's regulations governing CPNI, as set forth in 47 C.F.R. § 64.2001 et seq.

2. The Company ensures that it is in compliance with the FCC's CPNI regulations. The Company trains its personnel regarding when they are authorized to use CPNI, when they are not authorized to use CPNI, and how to safeguard CPNI. The Company maintains a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for changes in law. The CPNI Manual contains all essential information and forms to ensure the Company's compliance with CPNI regulations.

3. The Company has established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

4. Company personnel make no decisions regarding CPNI without first consulting with management.

5. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

6. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

7. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Company's own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

8. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Company will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

9. The Company maintains records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

10. The Company complies with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters."

11. The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains Company personnel accordingly.

Explanation of Actions Against Data Brokers

12. The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

Summary of all Customer Complaints Received

13. The following is a summary of all customer complaints received in calendar year 2014 concerning the unauthorized release of CPNI: None.

14. The Company does not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.