



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  
Roosevelt County Rural Telephone Cooperative, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Roosevelt County Rural Telephone Cooperative, Inc. (499 Filer ID No. 803292) 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  
Roosevelt County Rural Telephone Cooperative, 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: Roosevelt County Rural Telephone Cooperative, Inc.

Form 499 Filer ID: 803292

Name of signatory: Cecile Archibeque

Title of signatory: General Manager

I, Cecile Archibeque, certify that I am an officer of the cooperative named above, and acting as an agent of the cooperative, that I have personal knowledge that the cooperative 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 cooperative's procedures ensure that the cooperative 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 cooperative has not taken any actions (*i.e.*, proceedings instituted or petitions filed by the cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The cooperative does not have any information that pretexters have attempted to gain access to CPNI.

The cooperative 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: \_\_\_\_\_

  
Cecile Archibeque

Attachment: Accompanying Statement of CPNI Compliance and Procedures

ROOSEVELT COUNTY RURAL TELEPHONE COOPERATIVE, INC.  
STATEMENT OF COMPLIANCE and PROCEDURES  
For Year Ending 2014  
Form 499 Filer ID: 803292

1. This Statement of Compliance for Roosevelt County Rural Telephone Cooperative, Inc. ("Roosevelt" or "the Cooperative") is attached to and referenced within the Cooperative's 2014 Annual CPNI Certification.
2. Roosevelt 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 Cooperative 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 cooperative employees.
4. Roosevelt does use, disclose and/or permit access to CPNI and shares that information with its telecommunication affiliates and/or agents for marketing campaigns. Therefore, Roosevelt has obtained customer permission to utilize CPNI for this purpose in accordance with the FCC Opt-Out rules and requirements. The Cooperative, its affiliates and/or Agents maintain records of sales and marketing campaigns that access and use customer CPNI. The Cooperative has a supervisory review process in place for each such marketing campaign. Roosevelt also has a system by which the status of a customer's CPNI approval is clearly established prior to the use of CPNI.
5. Roosevelt, its affiliates and/or Agents do use, disclose and/or permit access to CPNI for marketing campaigns. Therefore, Roosevelt has obtained customer permission to utilize CPNI for this purpose in accordance with the FCC Opt-Out rules and requirements.
6. For year ending 2014, Roosevelt 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.
7. For year ending 2014, Roosevelt has not received any customer complaints concerning the unauthorized access, breach, release or usage of CPNI.