CPNI CERTIFICATON
Annual 47 C.F.R. § 64.2009(e)
EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2014

Date Completed: February 25, 2015

Name of company: Delta Valley Radiotelephone Co., Inc.

Licensee's FRN: 0004513636

Name of signatory: Robert LaRue

Title of signatory: President

I, Robert LaRue, 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*. *See, also*, CC Docket No. 96-155 and WC Docket No. 04-36 and *Public Notice*, DA 13-61 (published January 16, 2013), Enforcement Advisory No. 2013-02 and *Public Notice*, DA 15-178 (published February 9, 2015, Enforcement Advisory No. 2015-02.

Attached to this certification is an accompanying statement explaining the company's procedures to 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 in the past year. At this time, the Company does not have any information to report with respect to the processes pretexters are using to attempt to access CPNI.

The Company did not receive any customer complaint 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, and acknowledges that false statements to the Commission are punishable under Title 18 of the U.S. Code.

Signed Robert LaRue

DELTA VALLEY RADIOTELEPHONE COMPANY, INC.
POLICIES FOR USE OF CPNI

The following policies are hereby established for the use of Customer Proprietary Network Information (CPNI) in accord with the rules of the Federal Communications Commission (FCC). All employees, agents, affiliates and subcontractors are bound by these policies regarding the use and protection of customers' CPNI. Violations of these policies will cause the violator to be subjected to disciplinary or remedial action at the discretion of management.

It is important to realize that these policies have been created in compliance with FEDERAL LAW, specifically Title 47 of the United States Code of Federal Regulations, Sections 64.2001-9. These laws were created to protect our customers and our required protection will be deemed a priority for all purposes. Therefore, you must take seriously your obligation to comply with each of the following policies, in compliance with Section 222 of the Communications Act.

READ CAREFULLY

1. A customer's CPNI may be employed internally for the purpose of offering our existing customers additional services that we provide to the marketplace. Those services must, however, be offered by us and not affiliated companies, unless such use is approved by management to determine whether CPNI use is in accord with FCC guidelines.

2. Customer approval is required for use of that customer's CPNI if we are offering a different category of service from the one that the customer is presently receiving. However, one can offer Customer Premises Equipment (mobiles, consoles, portables) to deliver existing services that we are providing that customer, using that customer's CPNI.

3. Under no circumstances will anyone track a customer's use of its CPNI to determine whether that customer is contacting any competing provider of our services.

4. A Customer's CPNI can be used to protect that customer's safety of life or property; to offer adjunct-to-basic services (e.g. call forwarding); or to participate in research regarding the health effects related to the use of company-provided equipment.

5. When a customer's approval to employ its CPNI is required, the request should normally be made in writing to be signed by the customer, however, oral approval is permitted but will require the recipient of that approval to

make specific record of that approval including the date, time and identity of the customer representative who provides such approval. All such records must be filed within our records and be maintained for a period of not less than one year.

6. Any customer may revoke or limit its approval to our use of its CPNI. If this occurs, the incident should be recorded and that record made a portion of our files.

7. Opt-in or Opt-out policies that allow customers to choose to have products and services marketed to them by employment of their CPNI may be used by the company at some future date. Such policies are not presently used. If used, employees shall strictly adhere to all limitations and directions given for such policies.

8. In the event that the company markets its products and services in cooperation with a joint venturer or contractor, all such marketing using customers CPNI will not commence until that joint venturer or contractor agrees, in writing, to be bound to fulfill those obligations mandated under 47 C.F.R. §64.2007.

9. Prior to solicitation for customer approval to use their CPNI when such prior approval is required, the company will provide written notification to each such customer that explains that the customer is not required to give such approval and records of such notification will be maintained for at least one year. All such notifications must be approved by management to determine that the notification complies with 47 C.F.R. §64.2008.

10. These policies will be made available to all employees and fully explained to each employee to assure that they understand the nature of CPNI and customers' rights granted by the FCC. Any employee that does not understand these policies or requires further explanation of these policies will immediately contact their supervisor prior to taking any action which might violate these policies.

11. Any use of CPNI as a portion of a marketing campaign will be fully recorded and the documents recording each event, including the specific use, the services offered, whether the services are offered by the company or an affiliate, and all other relevant details of such use. Those records must be maintained by the company for no less than one year and will contain all information required under 47 C.F.R. §64.2009(c).

12. In the event of any complaint from a customer regarding use of its CPNI which the customer deems improper, the employee that responds to that complaint shall make a record of that complaint, including the means employed of addressing the customer's concern, and that record will be maintained in the company's files for at least one year. In the event that the problem arises due to circumstances associated with an Opt-out program that are not mere anomalies, management shall make notification to the FCC regarding such problems within five days of the customer(s) reporting of such problems, in accord with 47 C.F.R. §64.2009.

The above policies shall be monitored for compliance by company management, including periodic overview of customer records to assure that all necessary notifications and other relevant records are being maintained. A copy of this policy statement shall be distributed to each of the company's employees and any questions arising out of future compliance with these policies shall be communicated to management. In the event that any confusion arises regarding the applicability or interpretation of any of the above policies, employees shall first communicate such instance to management for the purpose of future handling and will not, until receiving further direction from management, disclose or use any customer's CPNI.

As an extra precaution, all persons covered by these policies should contact management for further directions and instructions in the event of the following:

A. There is some question as to whether a customer representative has the authority to grant permission to use that customer's CPNI in cases where permission is required.

B. Prior to commencing any marketing or sales campaign employing CPNI.

C. Prior to commencing any marketing or sales campaign with any affiliated company employing either our company's gathered CPNI or the affiliated company's gathered CPNI.

D. Prior to any action taken pursuant to any future opt-in or opt-out policy being implemented.

E. In response to any request made by any law enforcement agency requesting CPNI as a portion of the investigation.

As further assistance to our employees, a copy of the applicable FCC rules has been attached hereto for reference

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§64.2009 Safeguards required for use of customer proprietary network information.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include 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 CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

[63 FR 20338, Apr. 24, 1998, as amended at 64 FR 53264, Oct. 1, 1999; 67 FR 59213, Sept. 20, 2002; 72 FR 31962, June 8, 2007]