CERTIFICATE OF COMPLIANCE

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

1. Date filed: February 27, 2015
2. Name of company covered by this certification: St. Thomas and San Juan Telephone Company, Inc.
3. Form 499 Filer ID: 811564
4. Name of signatory: Mesfin Demise
5. Title of signatory: Chief Financial Officer

Certification:

I, Mesfin Demise, 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 set forth in 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.

The company has not taken any actions against data brokers in the past year, including any proceedings instituted in the courts or any state or federal regulatory agency. I am not aware of any processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

Mesfin Demise
Chief Financial Officer
St. Thomas and San Juan Telephone
Company, Inc.
February 24, 2015

Statement of CPNI Procedures and Compliance

St Thomas and San Juan Telephone Company, Inc. ("STSJ VI" or "the Company") does not use, disclose or permit access to CPNI to market any services outside of the "total services approach" as specified in 47 CFR § 64.2005. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes and at present does not use, disclose or permit access to CPNI for any marketing purposes at all. If STSJ VI elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. STSJ VI will develop and implement an appropriate tracking method to ensure that customers' CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes. Outbound marketing situations, if any, are subject to supervisory/management review to ensure compliance with these rules, as necessary.

Consistent with the Commission's rules, STSJ VI uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of STSJ VI, other users, and other carriers from unlawful use; and (3) providing inside wiring, installation, maintenance, and repair services.

STSJ VI does not currently market to customers that call and make inquiries concerning their account information. But should the Company choose to do so in the future, it will obtain a customer's oral authorization. STSJ VI will also require each representative to provide the disclosures required by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

STSJ VI has implemented procedures whereby it will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer's identity prior to disclosing CPNI, STSJ VI authenticates the customer using a variety of methods. STSJ VI has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant rules. STSJ VI does not allow online access to CPNI.

STSJ VI has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, STSJ VI will notify affected customers. STSJ VI will maintain a record of any CPNI-related breaches for a period of at least two years.

All STSJ VI employees who have access to CPNI receive training about CPNI compliance. Specifically, a summary of STSJ VI CPNI policies are included in its Employee Handbook, and all employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All STSJ VI employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by STSJ VI. Employees who do not abide by these policies or otherwise

permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.