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January 29, 2016

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 Dell Telephone Cooperative, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Dell Telephone Cooperative, Inc. (499 Filer ID No. 808560) for 2015 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 830-895-7226 or sgatto@gvnw.com with any questions or concerns.

Sincerely,

Steve Gatto
Authorized Representative for
Dell Telephone Cooperative, Inc.

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

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

EB Docket 06-36

Annual Section 64.2009(e) CPNI Certification for 2015

1. Date filed: January 29, 2016

2. Name of Cooperative: Dell Telephone Cooperative, Inc.

3. Form 499 Filer ID: 808560

4. Name of signatory: Denny Bergstrom

5. Title of signatory: General Manager / Executive Vice President

6. Certification:

I, Denny Bergstrom, 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 (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 (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.

The Cooperative 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 Cooperative 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 Denny Bergstrom

Denny Bergstrom, General Manager / Executive Vice President

Attachment: Statement of CPNI Compliance and Procedures

DELL TELEPHONE COOPERATIVE, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For The Year Ending 2015
Form 499 Filer ID: 808560

1. This Statement of Compliance for Dell Telephone Cooperative, Inc. ("Dell" or "the Cooperative") is attached to and referenced within the Cooperative's 2015 Annual CPNI Certification.

2. Dell 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. For the year ending 2015, Dell 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 brokers or pretexters.

5. For the year ending 2015, Dell has not received any customer complaints concerning the unauthorized access, breach, release, or usage of CPNI.