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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2015

Date: 2/**02/2016**

Name of Company covered by this certification: **Southwest Arkansas Telephone Cooperative, Inc. including services provided by Southwest Arkansas Telephone Long Distance under the same Form 499 Filer ID.**

Form 499 Filer ID: **808380**

Name of signatory: **Sherri Knigge**

Title of signatory: **Compliance Officer**

I, Sherri Knigge, 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 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.

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: Sherri Knigge
Sherri Knigge – Compliance Officer
Southwest Arkansas Telephone Cooperative, Inc.

Attachments: Accompanying Statement explaining CPNI procedures.

Explanation of Southwest Arkansas Telephone Cooperative, Inc CPNI policy procedures:

The policy of Southwest Arkansas Telephone Cooperative, Inc. is to comply with the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

The FCC's regulations, 47 CFR 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. Southwest Arkansas Telephone Cooperative, Inc. has compiled a manual, which constitutes the Company's policies and procedures related to CPNI. All employees are required to follow the policies and procedures specified in this Manual. Southwest Arkansas Telephone Cooperative, Inc. employees have received training on these policies and procedures. Southwest Arkansas Telephone Cooperative, Inc. management has been trained to ensure that strict compliance to this Manual is achieved. Southwest Arkansas Telephone Cooperative, Inc. operating procedures ensure compliance with the CPNI rules, which include new carrier authentication requirements, a requirement to notify customers of account changes, and a requirement to notify both law enforcement and customers in the event of a CPNI breach.