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February 5, 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 Bristol Bay Telephone Cooperative, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Bristol Bay Telephone Cooperative, Inc. (499 Filer ID No. 809088) 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
Bristol Bay 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: February 5, 2016

2. Name of Company: Bristol Bay Telephone Cooperative, Inc.

3. Form 499 Filer ID: 809088

4. Name of signatory: Todd Hoppe

5. Title of signatory: General Manager

6. Certification:

I, Todd Hoppe, 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 _____
Todd Hoppe, General Manager

Attachment: Statement of CPNI Compliance and Procedures

BRISTOL BAY TELEPHONE COOPERATIVE, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For The Year Ending 2015
Form 499 Filer ID: 809088

This accompanying statement explains how the operating procedures of Bristol Bay Telephone Cooperative, Inc. ("Bristol Bay" or "the Cooperative") are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations and as referenced within the Cooperative's 2015 Annual CPNI Certification.

Bristol Bay adheres to all CPNI rules as stated in 47 C.F.R. §§ 64.2001 – 64.2011 concerning the proper use of a customer's CPNI. Specifically, this statement for use of CPNI meets all the requirements as listed in 47 C.F.R. § 64.2008. To further protect the customer's privacy, all the safeguards required by 47 C.F.R. § 64.2009 have been implemented. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of the Cooperative's, and the Cooperative's affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of an annual certification by a corporate officer with personal knowledge of the Cooperative's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification to the Federal Communications Commission of any instance where opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.

Bristol Bay has its updated CPNI Manual available on file at its business office for further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.