Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ANNUAL § 64.2009 CPNI CERTIFICATION

FOR CALENDAR YEAR 2015

SULLY TELEPHONE ASSOCIATION
FCC FORM 499 FILER ID: 809746

EB Docket No. 06-36

Sully Telephone Association
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I. Introduction

Sully Telephone Association ("the Company"), hereby submits its 2015 CPNI compliance certificate in accordance with § 64.2009(e) of the Commission's rules.

II. Statement of Compliance with CPNI Requirements

The Company has implemented operating procedures and safeguards to ensure compliance with 47 CFR §64.2005 - §64.2009. To this end, the Company has procedures in place which ensure that:

- Employees who have access to customer data are trained to identify what information is CPNI,
- The Company has no affiliates that provide services to the Company's customers,
- CPNI is not shared with any third parties absent a court order or subpoena,
- CPNI is not used in any outbound telemarketing campaigns. This is ensured through ongoing supervisory oversight,
- Procedures are in place to notify customers if CPNI is going to be used or otherwise disclosed, and there is a process in place to allow individual customers to "opt out" of this use,
- Procedures are in place to authenticate the identity of callers to their business office before any CPNI is discussed,
- Formal training is provided by the Company on CPNI regulations and the related procedures in place to ensure compliance.

III. Actions Taken Against Data Brokers

The Company has not taken any actions against data brokers in the past year. The Company understands that it must report on any information it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps the Company is taking to protect CPNI.

IV. Consumer Complaints Regarding Unauthorized Release of CPNI

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. The following table illustrates this point, and will be used by the Company on an ongoing basis to track CPNI customer complaints for both internal purposes and FCC reporting.

Consumer Complaint Summary by Complaint Type – 2015	
Type of Consumer Complaint	***Complaints***
Improper access by employees	0
Improper disclosure to individuals not authorized to receive the information	0
Improper access to online information by individuals not authorized to view the information	0
Total Consumer Complaints	0

V. Certification

I, Jack DeAngelo, 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*.

I have undertaken to an investigation, with assistance from personnel within our company, of the procedures related to CPNI acquisition, storage, protection, use, and customer permission to use data of the Company. Section II of this certification includes a statement explaining how the Company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Based upon my personal investigation, it is my opinion that the operating procedures of the Company are in compliance with the Commission's CPNI rules as outlined in 47 CFR §64.2005 - §64.2009.

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.

Officer Name: Jack DeAngelo

Officer Title: General Manager

Signature: Ed "Jack" [signature]

Date: 2-10-16