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February 11, 2016

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual Section 64-2009(e) CPNI Certification
Woodhull Telephone Company (499 Filer ID: 804756)

Dear Ms. Dortch:

On behalf of Woodhull Telephone Company ("Woodhull") and pursuant to 47 C.F.R. Section 64.2009(e) of the Commission's rules, I am attaching Woodhull's Annual CPNI Certification and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

Adam W. Holstun
Consultant

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI 2016 Certification covering the prior calendar year 2015

Date filed: February 11, 2016

Name of company covered by this certification: Woodhull Telephone Company

Form 499 Filer ID: 804756

Name of signatory: Gerald Krueger

Title of signatory: Vice President

I, Gerald Krueger, 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 (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.

The company has not taken actions (*i.e.,* proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received 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 Gerald Krueger
Gerald Krueger

CPNI Compliance Accompanying Statement

Year: 2015

Woodhull Telephone Company

This accompanying statement explains Woodhull Telephone Company's operating procedures ensure that the company is 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.

Woodhull Telephone Company adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. 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 our own, and our 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 annual certification by a corporate officer with personal knowledge of Woodhull Telephone Company's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission within 5 business days 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.