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February 19, 2016

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

RE: EB Docket No. 06-36, CPNI Annual Filing for 2015 Calendar Year

Ms. Dortch,

Please see the attached EB Docket No. 06-36, the annual CPNI filing, for the 2015 calendar year. The filing is being completed on behalf of all Arvig companies, listed in the attached documents. Each company has a 499 Filer ID, which is listed in the certification, except for Diversicom Long Distance and Mainstreet Communications Long Distance. The filing is being completed using the FCC ECFS online filing system and via email to Best Copy and Printing, Inc.

If there are any questions, please feel free to contact me at the information below.

Sincerely,

Staci Malikowski
Chief Financial Officer
Arvig
218-346-8498
staci.malikowski@arvig.com

Enclosures

cc: Best Copy and Printing, Inc.
445 12th Street
Suite CYB402
Washington, DC 20554
via email: fcc@bcpiweb.com

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

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

1. Date filed: February 19, 2016

2. Name of company(s) covered by this certification: East Otter Tail Telephone Company dba Arvig, Callaway Telephone Company dba Arvig, Twin Valley-Ulen Telephone Company dba Arvig, Tekstar Communications, Inc. dba Arvig, Royale Comtronics, Inc. dba Arvig Long Distance, Midwest Telephone Company dba Arvig, Osakis Telephone Company dba Arvig, The Home Telephone Company dba Arvig, The Peoples Telephone Company of Bigfork dba Arvig, Redwood County Telephone Company dba Arvig, Clements Telephone Company dba Arvig, Loretel Systems, Inc. dba Arvig, Arrowhead Communications Corp. dba Arvig, Eagle Valley Telephone Company dba Arvig, Felton Telephone Company dba Arvig, Redwood Long Distance Company dba Arvig Long Distance, Melrose Telephone Company dba Arvig, Mainstreet Communications, LLC dba Arvig, Diversicom Long Distance dba Arvig Long Distance, and Mainstreet Communications Long Distance dba Arvig Long Distance

3. Form 499 Filer ID: 811492, 806904, 803133, 803130, 825278, 803466, 804774, 801591, 819354, 807708, 804762, 807709, 801930, 801081, 801933, 802059

4. Name of signatory: Staci Malikowski

5. Title of signatory: Chief Financial Officer

6. Certification:

I, Staci Malikowski, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies 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 companies' procedures ensure that the companies are 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 companies have not taken any 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 companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The companies also acknowledge 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 Staci Malikowski

**Attachment:** Accompanying Statement explaining CPNI procedures

## STATEMENT OF COMPLIANCE – FOR CALENDAR YEAR 2015

The operating procedures of **East Otter Tail Telephone Company dba Arvig, Callaway Telephone Company dba Arvig, Twin Valley-Ulen Telephone Company dba Arvig, Tekstar Communications, Inc. dba Arvig, Royale Comtronics, Inc. dba Arvig Long Distance, Midwest Telephone Company dba Arvig, Osakis Telephone Company dba Arvig, The Home Telephone Company dba Arvig, The Peoples Telephone Company of Bigfork dba Arvig, Redwood County Telephone Company dba Arvig, Clements Telephone Company dba Arvig, Loretel Systems, Inc. dba Arvig, Arrowhead Communications Corp. dba Arvig, Eagle Valley Telephone Company dba Arvig, Felton Telephone Company dba Arvig, Redwood Long Distance Company dba Arvig Long Distance, Melrose Telephone Company dba Arvig, Mainstreet Communications, LLC dba Arvig, Diversicom Long Distance dba Arvig Long Distance, and Mainstreet Communications Long Distance dba Arvig Long Distance** ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

### *Use of CPNI in Marketing*

Our companies do not use CPNI in any of its marketing efforts, and do not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

Our companies make limited, one-time use of CPNI to market our communication-related services only in compliance with FCC Rule 64.2008.

Before (but proximate to) soliciting customer consent for the use of CPNI to market either (a) our (or our affiliates') communication-related services; or (b) third-parties' communication-related services, we give each customer notice of his or her right to restrict use and disclosure of, and access to, his or her CPNI, in compliance with FCC Rule 64.2008. Our companies maintain a record of these notifications for at least one year.

Our companies have implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether or not we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

Our companies access and use a customer's CPNI to market our own (or our affiliates') communication-related services (outside a customer's current relationship) only after the customer's Opt-Out consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer. Every two years our companies (a) provide notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicit Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008, to each customer who has given Opt Out consent.

Our companies permit access to and use of a customer's CPNI by third parties in order to market their communication-related services only after the customer's Opt-In consent has been obtained in compliance with FCC Rule 64.2008, and which consent has not been revoked by the customer.

Our companies have a supervisory review process regarding our compliance with the FCC's CPNI rules for any outbound marketing efforts. We require sales personnel to obtain supervisory approval of any proposed outbound marketing request for customer approval.

### *CPNI Safeguards*

Our companies have designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our companies train its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our companies authenticate the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our companies disclose call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our companies disclose CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our companies establish passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our companies have established password protection for customers' online accounts.

Our companies include terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Our companies notify a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

***CPNI Recordkeeping and Reporting***

Our companies maintain a record of our own and our affiliates' sales and marketing campaigns that use customer CPNI. We also maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. We maintain these records for at least one year.

Our companies maintain records of our compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

Our companies are prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our companies are prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our companies will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.