February 6, 2006

VIA ECFS
Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Re: **EB Docket 06-36; EB-06-TC-060**
Certification of CPNI Filing 2-6-06
Conestoga Telephone and Telegraph Company
CPNI Compliance Certificate and
Statement of CPNI Operating Procedures and Policies

Dear Ms. Dortch,

Pursuant to the Federal Communications Commission's February 2, 2006 Public Notice (DA 06-258) directing all telecommunications carriers to submit a compliance certificate to the Commission as required by section 64.2009(e) of the Commission's rules, Conestoga Telephone and Telegraph Company submits the following:

- Carrier certificate for most recent period
- Statement of CPNI Operating Procedures and Policies

Please contact me at (717) 738-8169 if you have any questions. Thank you.

Sincerely,

Jeanne Price

Jeanne Price
Regulatory Relations Supervisor

cc via electronic mail:
Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau
Best Copy and Printing, FCC Copy Contractor

Conestoga Telephone and Telegraph Company
2004 CPNI Compliance Certificate

Company Name:	Conestoga Telephone and Telegraph Company dba Conestoga Telephone Company
Address:	202 East First Street Birdsboro, PA 19508

As a corporate officer of the company referenced above (the "Company"), I hereby certify that based on my personal knowledge the Company is compliant with the rules established by the Federal Communication Commission ("FCC") concerning the permissible use of Customer Proprietary Network Information ("CPNI"), specified in Section 64 of the FCC's rules, 64 C.F.R. Section 2001 et seq., as described below.

Permissible Uses of CPNI Without Customer Approval:

1) Unless it first obtains a customer's approval, the Company only uses, discloses, or permits access to its customer's CPNI in order to provide or market service offerings among categories of service (such as local, interexchange, or CMRS) to which the customer already subscribes. In addition, the Company acknowledges that:

a) If a customer subscribes to more than one category of service offered by the Company, the Company may share the customer's CPNI with its affiliates that provide services to the customer;

b) If a customer subscribes to only one of several categories of service offered by the Company, then the Company does not share the CPNI with its affiliates; and,

c) If the Company provides customer premises equipment ("CPE") and/or information services to a customer that are bundled with telecommunications services, CPNI independently derived from the provision of CPE and/or information services may subsequently be used to market new CPE or a similar information service that is bundled with telecommunications service. Alternatively, if the customer had not previously purchased CPE or information services from the Company, the Company acknowledges that it does not use the customer's CPNI to market a bundled offering of CPE and/or information services with telecommunications services without first obtaining customer approval.

2) The Company does not use, disclose or permit access to CPNI to market service offerings to a customer that is within a category of service to which the customer does not already subscribe from the Company unless the Company has customer approval to do so, except as follows:

a) Unless it first obtains customer approval, the Company does not use, disclose or permit access to CPNI derived from its provision of local service, interexchange service, or CMRS in order to market related CPE and information services, including call answering, voice mail messaging, voice storage and retrieval services, fax store and forward, and Internet access services (if offered);

b) The Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers; and

c) The Company does not use, disclose or permit access to a former customer's CPNI to regain their business when they have switched to a competing service provider.

3) The Company understands that it may use, disclose or permit access to CPNI in the following instances without obtaining customer approval:

a) Providing inside wiring installation, maintenance and repair services; and

b) In its provision of CMRS or as a local exchange carrier ("LEC"), the Company may use CPNI without customer approval, to market services formerly known as "adjunct-to-basic" services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features.

Notice and Approval Required for CPNI Use:

1) The Company understands that it must obtain customer approval to use, disclose, or permit access to CPNI to market services that are not within a category of services to which that customer already subscribes.

2) The Company may obtain such approval through oral, written or electronic methods.

3) If the Company relies on oral approval it understands that it bears the burden of demonstrating that such approval has been given in compliance with the FCC rules.

4) Approval obtained by the Company for the use of CPNI outside the customer's total service relationship with the Company remains in effect until the customer revokes or limits such approval.

5) The Company maintains records of notification and approval, whether oral or electronic, for at least one year.

6) Prior to any request for customer approval, the Company provides a one-time notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. The company acknowledges that:

a) Such notification is provided either by oral or written methods;

b) Such customer notification provides sufficient information to enable the customer to make an informed decision as to whether to permit the Company to use, disclose or permit access to the customer's CPNI;

c) The notification states that the customer has a right, and the Company a duty, under federal law to protect the confidentiality of CPNI;

d) The notification specifies the types of information that constitute CPNI and the specific entities that will receive the CPNI, describes the purposes for which CPNI will be used, and informs the customer of his or her right to disapprove those uses, and denies or withdraws access to CPNI at any time;

e) The notification advises the customer of the precise steps the customer must take to grant or deny access to CPNI, and clearly states that a denial of approval will not affect the provision of any services to which the customer subscribes;

f) The notification is comprehensible and is not misleading;

g) If written notification is provided, the notice is clearly legible, uses sufficiently large type, and is placed in an area of the document so as to be readily apparent to a customer;

h) If any portion of a notification is translated into another language, then all portions of the notification are translated into that language;

i) The Company may state in the notification that the customer's approval to use CPNI may enhance the Company's ability to offer products and services tailored to the customer's needs. The Company also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer;

j) The Company does not include in the notification any statement attempting to encourage a customer to freeze third party access to CPNI;

k) The notification states that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes to from the Company is valid until the customer affirmatively revokes or limits such approval or denial;

l) The Company's request for approval is proximate to the notification of a customer's CPNI rights; and

m) The Company's request for approval, if written, is not on a document separate from the notification, even if such document is included within the same envelope or package.

Information Required Prior to Use of CPNI:

1) The Company acknowledges the FCC's requirement that carriers must develop and implement software that indicates within the first few lines of the first screen of a customer's service record their CPNI approval status, as well as reference the customer's existing service subscription.

Conestoga Telephone and Telegraph Company
2004 CPNI Compliance Certificate

2) The Company acknowledges the FCC's requirement that telecommunications carriers must train their personnel as to when they are and are not permitted to use CPNI, and that carriers must have an express disciplinary process in place in case of a breach of these standards.

3) The Company acknowledges the FCC's requirement that telecommunications carriers must maintain an electronic audit mechanism that tracks access to customer accounts, including when a customer's record is opened, by whom, and for what purpose. Per the FCC's rules, the Company will maintain these contact histories for a minimum period of one year.

4) The Company acknowledges the FCC's requirement that telecommunications carriers must establish a supervisory review process to monitor the compliance of its outbound marketing operations with the FCC's CPNI rules. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request. Per the FCC's rules, the Company will maintain records of its compliance with this requirement for a minimum period of one year.

In addition to the foregoing acknowledgments, and incorporated as part of this certification, attached is a statement explaining the office procedures, computer software, or other programs the Company is using to comply with the Commission's restrictions on the use of CPNI (such as distinguishing the CPNI of customers who have not consented to the Company's use of this information for marketing purposes).

I hereby certify that the statements contained within this certification and within its incorporated compliance statement are accurate and complete to the best of my ability.

Witness: Mary Ann L Newton	By: G. William Ruhl
Signature	Signature
MARY ANN L. NEWTON	G. William Ruhl
Name	Name
Staff Assistant	President and CEO
Title	Title
2/15/05	2/15/05
Date	Date

Statement of CPNI Operating Procedures and Policies

Conestoga Telephone and Telegraph Company (the "Company") has operating procedures designed to ensure that the Company is in compliance with the FCC's Customer Proprietary Network Information ("CPNI") rules.

The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established by Company personnel prior to their use of CPNI. Specifically, the main screen on a customer's account has a flag indicating the customer's approval, or denial, for the Company to use, disclose, or access the customer's CPNI. In addition, prior to marketing any service, the Company generates a list of customers based on the CPNI approval status of each account.

Company personnel are trained as to when they are and are not authorized to use CPNI, and personnel are subject to disciplinary action for failure to comply with CPNI rules. Specifically, upon employment, all personnel must acknowledge they have read and understand the Company's Customer Confidentiality and Communications Policy and sign an agreement. In addition, information relative to CPNI and applicable CPNI rules are posted on the Company's intranet homepage and included in the Company's Voice Customer Service Manual.

The Company keeps records of its sales and marketing campaigns that use CPNI. Specifically, the Company completes a report for each campaign including a description of the campaign and the customers targeted by the campaign. Customers who have elected not to permit the disclosure of their CPNI are excluded from the campaign. The records are maintained for a minimum of one year. CPNI has never been requested from or provided to third parties. If CPNI were ever to be provided to third parties, the Company would maintain records of that provision for a minimum of one year.

The Company has established a supervisory review process regarding carrier compliance with the CPNI rules. Specifically, the Company has acknowledgements from each of its employees that they have read and understand the Customer Confidentiality and Communications Policy. Second, the Company's Voice Customer Service Manual outlines CPNI rules. Finally, the importance of protecting the confidentiality of CPNI is raised and stressed at each staff meeting and all employees with access to the customer record system are aware that all access to CPNI is monitored and identified internally by the system.

The Company will provide written notice to the FCC within five business days of any instance where the required opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.