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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

DOCKET WITH COPY ORIGINAL

**Re: EB Docket No. 06-36 and EB-06-TC-060, Certification of CPNI Filing 2006**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB Docket No. 06-36 and EB-06-TC-060.

**Company Name(s): New Ulm Telecom, Inc. – ILEC  
New Ulm Telecom, Inc. – CLEC  
Western Telephone Company  
Peoples Telephone Company  
New Ulm Long Distance, Inc.  
New Ulm Phony, Inc.  
New Ulm Cellular #9, Inc.**

**Address 27 North Minnesota Street**

**City, State New Ulm, MN 56073**

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 et seq., as revised.

The attached Statement demonstrates such compliance.

*Nancy Blankenhagen*  
Signature

*CFO*  
Title

*2/2/06*  
Date

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**Attachment**

Corporate Headquarters  
New Ulm Telecom, Inc.  
27 N. Minnesota St.  
New Ulm, MN 56073  
Voice: 507 354-4111  
Fax: 507 354-1982

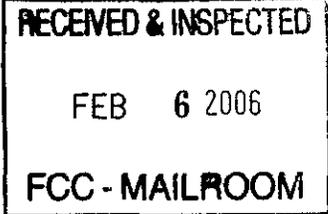
Redwood Falls  
NU-Telecom  
137 East 2<sup>nd</sup> St.  
Redwood Falls, MN 56283  
Voice: 507 627-4111  
Fax: 507 627-4110

Springfield  
NU-Telecom  
22 South Marshall St.  
Springfield, MN 56087  
Voice: 507 723-4211  
Fax: 507 723-4377

Aurelia, IA  
NU-Telecom  
221 Main St.  
Aurelia, IA 51005  
Voice: 712 434-5989  
Fax: 712 434-5555

cc: Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Best Copy and Printing, Inc.  
Portals II  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554



### Statement of Explanation: CPNI Compliance

This accompanying statement explains how the following named company's operating procedures ensure that we 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.

New Ulm Telecom, Inc. – ILEC  
New Ulm Telecom, Inc. – CLEC  
Western Telephone Company  
Peoples Telephone Company  
New Ulm Long Distance, Inc.  
New Ulm Phonery, Inc.  
New Ulm Cellular #9, Inc.

The above listed companies adhere to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval 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 training of appropriate personnel as to when they are, and are not, authorized to use confidential information, including CPNI;
- the implementation of an express disciplinary process for confidential information use violations, including CPNI;
- 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 maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the use of confidential information, including federal CPNI rules for outbound marketing situations; and
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.

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