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EB DOCKET NO. 06-36

Certification of CPNI Filing To FCC

My name is Richard D. Adams, and I am the Executive V.P./General Manager of Brazos Telephone Cooperative, Inc. ("the Cooperative") of Olney, Texas. I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") customer proprietary network information ("CPNI") rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations, Sections 64.2001 through 64.2011.

This certification is made pursuant to the requirements of the Federal Communications Commission ("FCC") under Section 64.2009(e) of the FCC Rules. The purpose of this certification is to verify this Cooperative's compliance with FCC requirements regarding the Cooperative's maintenance, use, and protection of customer proprietary network information ("CPNI").



Signature

Richard D. Adams

Printed Name

Executive V.P./General Manager

Title

Brazos Telephone Cooperative, Inc.

Company

February 04, 2008

Date

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**STATEMENT OF COMPLIANCE WITH THE  
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)  
RULES**

To the best of my knowledge, Brazos Telephone Cooperative, Inc. ("the Cooperative") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Cooperative's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011. Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F.R. §64.2010.

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

**Company CPNI Status:** To the best of my knowledge and belief, the Cooperative does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009.

During the past year (2007) the Cooperative has taken no action against data brokers and received no customer complaints concerning the unauthorized release of CPNI.