



Garden Valley Telephone Company

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An Equal Opportunity Employer

Received & Inspected

FEB -7 2008

FCC Mail Room

Annual 64.2009(e) CPNI Certification for 2007

Date filed: **February 6, 2008**

Name of Company covered by this certification: **Garden Valley Telephone Company**

Form 499 Filer ID: **803319**

Name of signatory: **Joe O. Sandberg**

Title of signature: **Treasurer**

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

044
2008 FEB 7

Re: **EB Docket No. 06-36**

I, Joe O. Sandberg, 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.*

Included in this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

CPNI Statement for Garden Valley Telephone Company

Garden Valley Telephone Company ("Garden Valley") has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

Garden Valley has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Garden Valley continually educates and trains its employees regarding the appropriate use of CPNI. Garden Valley has established disciplinary procedures should an employee violate the CPNI procedures established by Garden Valley.

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Garden Valley maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Garden Valley also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. No applicable campaigns were conducted in 2007.

Garden Valley has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Garden Valley's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed. No target marketing campaigns were conducted in 2007.

The company has not taken any actions against data brokers in the past year. Garden Valley has encountered no specific instances of pretexting in 2007, but is continuing to educate employees to verify the identity of anyone who requests access to any information covered by CPNI rules. Training includes the requirement to report any attempts at pretexting to the company's CPNI compliance officer.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sincerely,



Joe O. Sandberg, Treasurer

JOS/lh

C: FCC Enforcement Bureau
Best Copy and Printing, Inc.