



**PARK REGION**  
Mutual Telephone Co.



Park Region Telephone  
PO Box 277  
100 Main St.  
Underwood, MN 56586  
218-826-6161

Otter Tail Telcom  
230 W Lincoln  
Fergus Falls, MN 56537  
218-998-2000

Valley Telephone  
PO Box 277  
Underwood, MN 56586  
800-247-2706

February 18, 2008

Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
FCC  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: Revised Certification of CPNI Filing for 2007  
EB-Docket No. 06-36

Dear Ms. Dortch:

Please find the attached revised "Annual CPNI 2007" filing. The original filing done electronically on February 15<sup>th</sup> 2008 inadvertently excluded an attachment of 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. I apologize for the oversight.

If you have any questions regarding this filing, please give me a call at (218) 826-8311.

Sincerely,

Dave Bickett  
GM/CEO



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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 18, 2008

Name of company covered by this certification:  
Otter Tail Telcom, LLC  
230 W Lincoln  
Fergus Falls, MN 56537

Form 499 Filer ID: 819382

Name of signatory: Dave Bickett

Title of signatory: GM/CEO

I, Dave Bickett, 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.*

Attached to 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.

The company has not taken any actions (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 company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed \_\_\_\_\_  
Dave Bickett  
GM/CEO

Enclosure:

Cc: Federal Communications Commission, Telecommunications Consumers Division  
Best Copy and Printing, Inc.



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# Statement of Compliance Procedures for Customer Proprietary Network Information

1. Establishment of customer identity.
  - Customers are required to establish non-life-history-related passwords in order to gain access to information.
  - Company representative may verify customer identity by calling the customer back at the number of record or by verify identity via proof of valid photo ID matching the customer's account information.
  - Bill copies will only be provided via sending to the address of record either by postal or electronic form or in person with proof of valid photo ID. Further call detail requires court order.
2. Notification of customer account changes.
  - Customers are notified by company letter, text message, or voicemail of any changes of CPNI information.
3. Establishment of customer approval for CPNI use in Marketing.
  - Beginning in January 2003 and every other January thereafter, the company (a) provides notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008.
  - All new customers will be required to consent or reject to the use of their CPNI at the time of application for service. A written signature on the application serves as verification. The detailed opt-out notice, Exhibit A, will be mailed in new customer welcome packets as a further courtesy notice.
  - Customer consent or rejection of CPNI use is flagged in the billing system customer master file.
4. Training of company personnel.
  - Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.
  - Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI.
  - Failure of any staff member to seek approval and/or comply with CPNI guidelines will be subject to disciplinary action pursuant to Company Policy 3.005.
5. Records of CPNI use or disclosure.
  - Business Operations Manager must give prior approval for any sales/marketing campaigns which plan to utilize CPNI.
  - Business Operations Manager shall be responsible to maintain records for any sales/marketing campaigns which utilize CPNI for at least one year.
  - Business Operation Manager shall be responsible to approve and maintain record of any instance where CPNI is disclosed to a 3<sup>rd</sup> party.
  - Business Operations Manager and CPNI Compliance officer shall be responsible for annual review process of the compliance with CPNI rules.
6. Notification of Breach.
  - A notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC.

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