

Your Partner for the Future

www.tcatel.com



Date: February 26, 2008

FILED ELECTRONICALLY

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

RE: Certification of CPNI Filing, March 1, 2008 for 2007
FCC Docket EB 06-36
Tri-County Telephone Association, Inc..
Form 499 Filer ID: 804633

Dear Ms. Dortch:

On behalf of Tri-County Telephone Association, Inc., and pursuant to Section 64.2009(e) of the FCC rules, please find attached the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Please contact me with any questions or concerns.

Sincerely,

Leslie Christina Pilgrim
Senior Regulatory Consultant

Cc: Enforcement Bureau, FCC (2)
Best Copy and Printing, Inc. (1)

TCA Headquarters

1975 Research Pkwy - Suite 320 - Colorado Springs, CO 80920
Phone: 719-266-4334 - Fax: 719-266-4335
info@tcatel.com - www.tcatel.com

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: 2-25-2008

Name of company covered by this certification: The Tri-County Telephone Association, Inc.

Form 499 Filer ID: 804633

Name of signatory: Dale L. Jones

Title of signatory: C.E.O.

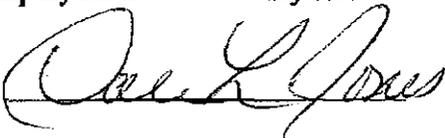
I, Dales L. Jones, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et 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, see Attachment A.

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.

Signed



Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of The Tri-County Telephone Association, Inc. ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.