ROSEBUD TELEPHONE, L. L. C.
P O BOX 597 • Rosebud, TX 76570 • 254-583-2700 • Fax 254-583-2027

February 28, 2008

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

Re: Docket No. EB 06-36

Dear Ms. Dortch:

Please find the enclosed Certificate of CPNI Filing. As requested, a copy is being sent to parties as listed below. If you need anything else for this filing, please do not hesitate to call.

I certify that Rosebud Telephone, LLC is in compliance with Section 64.2009 of the Commission's rules.

Sincerely,

/s/ Mary Ann Mitchell

Mary Ann Mitchell
Vice-President
Rosebud Telephone, LLC

Cc: **Via Certified Mail, Return Receipt Requested**
Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers Division, 445 12th Street SW, Washington, DC 20554

Via Electronic Mail
Best Copy and Printing, Inc.
FCC@BCPIWEB.COM

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for March 1, 2008 Deadline

Date filed: February 28, 2008

Name of company covered by this certification: Rosebud Cotton Company dba Rosebud Telephone LLC

Form 499 Filer ID: 809745

Name of signatory: MARY ANN MITCHELL

Title of signatory: Vice President

I, Mary Ann Mitchell, 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. I understand that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

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

Signed /s/ Mary Ann Mitchell
MARY ANN MITCHELL

ROSEBUD TELEPHONE, LLC
CERTIFICATE OF CPNI COMPLIANCE FILING

In compliance with the Communications Act of 1934, Rosebud Telephone, LLC hereby submits its CPNI procedures. It is our responsibility to protect our customers' CPNI, and any of our employees who disclose customers' CPNI face possible termination. Access to third parties of customers' CPNI for the purpose of identifying customers placing calls to competing carriers is not allowed without customer approval.

Rosebud Telephone, LLC takes its statutory responsibility to protect its customers' CPNI seriously and

Therefore does not sell, rent or otherwise disclose customers' CPNI to other entities.

Further, Rosebud Telephone, LLC does not currently use, nor allow its affiliates to use, any customers' CPNI in marketing activities without permission from the customer. Any request for CPNI is immediately forwarded to Attorney Mark Foster, the officer in charge of CPNI compliance.

Rosebud Telephone, LLC's employees have been educated about the Company's responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Sincerely,

/s/ Mary Ann Mitchell

Mary Ann Mitchell
Vice-President
Rosebud Telephone, LLC

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ROSEBUD TELEPHONE, LLC

CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI") PROCEDURES

Rosebud complies with all regulations pertaining to customer proprietary network information (CPNI) found at 47 C.F.R. 64.2001, et seq. The operating procedures of Rosebud ensure that the company is in compliance with these regulations and are designed to meet Rosebud's duty to protect CPNI from any disclosure or use that is not permitted by the rules of the Federal Communications Commission.

It is Rosebud's responsibility to protect its customers' CPNI, and any of our employees who disclose customers' CPNI face possible termination. Access to third parties of customers' CPNI for the purpose of identifying customers placing calls to competing carriers is not allowed without customer approval.

Rosebud Telephone, LLC takes its statutory responsibility to protect its customers' CPNI seriously and therefore does not sell, rent or otherwise disclose customers' CPNI to other entities.

Further, Rosebud Telephone, LLC does not currently use, nor allow its affiliates to use, any customers' CPNI in marketing activities.

Rosebud Telephone, LLC's employees have been educated about responsibility to its customers. Any unauthorized use, sale, or otherwise disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including immediate dismissal.

Further, Rosebud Telephone, LLC does not use, disclose or permit access to customers' CPNI for the purposes of identifying customers placing calls to competing carriers.

Specific procedures regarding safeguarding CPNI – as well as procedures to be followed if CPNI is ever used in marketing in the future – follow:

1. All disclosures or uses of Customer Proprietary Network Information ("CPNI") are to be approved by the customer except for valid law enforcement requests. Lacking customer approval, any request to utilize CPNI requires approval of the Vice President of Service to determine validity.

2. All disclosures of CPNI for law enforcement will be listed in the CPNI notebook/file along with backup documentation maintained by the designee of

the Vice President of Service. Rosebud does not disclose CPNI to third parties to be used for marketing purposes.

3. Employees are educated on the company's policy not to improperly disclose or use CPNI.

4. A corporate officer acting as agent for the Company will certify on an annual basis stating that the officer has personal knowledge that the Company has established the above operating procedures and that these procedures are adequate to ensure compliance with applicable CPNI rules.

5. Information protected by Rosebud includes all information defined as customer proprietary network information (CPNI) at section 222(h)(1) of the Communications Act of 1934, as amended, 47 U.S.C. 222(h)(1) including information that relates to the ***quantity***, technical configuration, type, destination, location and amount of use of a telecommunications service subscribed to by a customer and made available to Rosebud by the customer solely by virtue of the carrier-customer relationship. Also protected is information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

6. If and when customer approval to use, disclose, or permit access to customer CPNI is desired, Rosebud will obtain such customer approval through written or oral methods in accordance with 47 C.F.R. 64.2007. However, the Company will only utilize the oral authorization to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts, and such CPNI authority, if granted, lasts only for the duration of that specific call. Rosebud will honor a customer's approval or disapproval until the customer revokes or limits such approval or disapproval. All records of approval or disapproval will be maintained for at least one year.

7. Rosebud has established a procedure whereby all sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI and records reflecting carrier compliance with the Commission Rules are maintained for a minimum of one year.

8. Prior to any solicitation for customer approval, Rosebud will provide individual notification to customers of their right to restrict use of, or disclosure of, and access to the customer's CPNI. Records of these notifications will be maintained for a period of at least one year.

9. Rosebud's notifications will provide information sufficient to enable our customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Rosebud's notifications will: (1) contain a statement that the customer has a right, and Rosebud has a duty under federal law, to protect the confidentiality of CPNI; (2) specify the types of information that constitute CPNI and the specific entities that will receive the CPNI; (3) describe the

10. Rosebud's notifications will inform the customer that any approval or denial of approval for the use of CPNI outside of the service to which the customer already subscribes is valid until the customer affirmatively revokes or limits such approval or denial.

11. Rosebud advises its customers of the precise steps the customer must take in order to grant or deny access to CPNI, and that denial of approval will not affect the provision of any services to which the customer subscribes.

12. If CPNI is ever used in a sales or marketing campaign, Rosebud will maintain a record of its sales and marketing campaigns that use customers' CPNI. Further, a record of all instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI will be maintained by Rosebud. These records will reflect a description of the campaigns, the specific CPNI used in the campaign and what products or services were offered as part of the campaign. These records will be retained for a minimum of one year.

13. If Rosebud utilizes "opt out" approvals, it will wait at least 30 days after giving customers notice and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. Customers will be notified of the applicable waiting period in the "opt-out" notice that is sent. For electronic notifications, Rosebud recognizes that the waiting period begins to run on the date the notification is sent and, for mail notifications, the 30 days begins to run on the third day following the date the notification was mailed. Rosebud does not solicit CPNI authority via e-mail. "Opt-out" notices are provided to customers every two years.

14. Rosebud follows the procedures set forth in 47 C.F.R. 64.2010 to discover and protect against attempts to gain unauthorized access to CPNI. Customers are properly authenticated prior to disclosing CPNI based on customer-initiated telephone contact. Rosebud does not have retail location and does not have online access for customers' accounts.

15. Call detail information is only disclosed over the telephone, based on customer-initiated telephone contact, if the customer first provides the carrier with a password, as described at 47 C.F.R. 64.2010(e). If the customer does not provide a password, then call detail information is only disclosed by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without the Company's assistance, then the Company is permitted to discuss the call detail information provided by the customer.

16. Customers are immediately notified whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. Such notification is not required when the customer initiates service, including the selection of a password at service initiation. This notification may be through a carrier –

initiated voicemail or text message to the telephone number of record, or by mail to the address of record, and does not reveal the changed information or otherwise send the new account information.

17. Rosebud notifies law enforcement of any breach of its customers' CPNI in accordance with 47 C.F.R. 64.2011. Customers are notified only upon completion of law enforcement notification procedures.

18. Records of any breaches discovered, or notifications to law enforcement and customers are maintained for a minimum of two years. Records include, if applicable, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstance of the breach.