



March 1, 2008  
Via ECFS Transmission

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

RE: **Cooperative Light & Power Association of Lake County, Inc. - 2007 CPNI  
Certification Filing  
EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of Cooperative Light & Power Association of Lake County, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton  
Consultant to Cooperative Light & Power Association

RN/ks

cc: Best Copy and Printing - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
FCC Enforcement Bureau (provided via ECFS website)  
Kevin Olson - CO-OP  
file: CO-OP - FCC  
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ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: **2007**

Name of company covered by this certification: **Cooperative Light & Power Association  
of Lake County, Inc.**

Form 499 Filer ID: **824274**

Name of signatory: **Steve Wattnem**

Title of signatory: **General Manager**

I, **Steve Wattnem**, certify and state that:

1. I am the **General Manager** of **Cooperative Light & Power Association of Lake County, Inc.** and, acting as an agent of the company, I have personal knowledge of **Cooperative Light & Power Association of Lake County, Inc.**'s operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Cooperative Light & Power Association of Lake County, Inc.**'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. 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.



Steve Wattnem, General Manager  
Cooperative Light & Power Association of Lake County, Inc.

2/28/08

Date

**Statement of CPNI Procedures and Compliance  
For 2007  
Cooperative Light & Power Association of Lake County, Inc.**

Cooperative Light & Power Association of Lake County, Inc. is a rural electric cooperative serving two counties in Minnesota. We also offer resold long distance service to fewer than 800 customers. We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our employees have been trained not to use CPNI for marketing purposes. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have instituted authentication procedures to safeguard the disclosure of call detail over the telephone and to protect against attempts by third parties to gain unauthorized access to customer CPNI. Our customer service representatives will only discuss our customers' bills once the customer has specifically identified and provided the information in question. Alternatively, we will call the customer back at the phone number of record or mail to the address of record. Our two customer service representatives receive annual training regarding CPNI rules and internal compliance procedures.

We do not disclose CPNI on-line. If we elect to do so in the future, we will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

When changes to customer information are requested, customers are notified by mail of the requested change, which is sent without revealing the changed information or sending the notification to the new account information.

We will CPNI in-store upon presentation of a valid photo ID that matches the account information.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

We do not have any information with respect to the processes pretexters may use to attempt to access CPNI.