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BY HAND DELIVERY

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

FILED/ACCEPTED
FEB - 7 2008
Federal Communications Commission
Office of the Secretary

EB Docket No. 06-36
EB-06-TC-060

Re: CERTIFICATION OF CPNI COMPLIANCE FILING - FEBRUARY 7, 2008

Dickey Rural Telephone Cooperative	499 Filer ID # 803022
Dickey Rural Access, Inc.	499 Filer ID # 822620
Dickey Rural Communications, Inc	499 Filer ID # 803023

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
2 copies to Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 1 1 27
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DICKEY RURAL NETWORKS COMPANIES

Dickey Rural Telephone Cooperative 499 Filer ID 803022
Dickey Rural Access, Inc. 499 Filer ID 822620
Dickey Rural Communications, Inc 499 Filer ID 803023

9826 Hwy. 281, P.O. Box 69, Ellendale, ND 58436 (877) 559-4692

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2007 ANNUAL CERTIFICATION OF CPNI COMPLIANCE

EB Docket No. 06-36 January 25, 2008

I am Kari Nishek, Customer Care Manager of Dickey Rural Networks and its affiliated telecommunications carriers listed above ("collectively the Company"). On behalf of the Company, I hereby certify that I have personal knowledge that the Company was in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules¹ for the twelve months ending December 31, 2007. Accompanying this certificate is a statement explaining how the Company meets its compliance obligations respecting the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Kari Nishek
Customer Care Manager
Financial Officer
Dickey Rural Networks

January 25, 2008

Attachment

¹ 47 C.F.R. §§ 64.2001-2011.

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2007 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE **January 25, 2008**

This statement serves to explain how Dickey Rural Networks (“Company”), is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

During 2007, the Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits. The Company does not provide customers with on-line access to customer account information.

The Company has implemented password back-up authentication procedures.

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No customer complaints regarding data-brokers received in 2007.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.