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February 28, 2008

**By USPS Express Mail**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 30554

Attn: Chief, Media Bureau

**Re: Farmers Telecommunications Cooperative, Inc., Farmers Telecommunications Corporation, Inc., and Farmers Cellular Telephone Inc., DBA Farmers Wireless Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of, Farmers Telecommunications Cooperative, Inc., Farmers Telecommunications Corporation, Inc., and Farmers Cellular Telephone Inc., DBA Farmers Wireless we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

Christopher E. Townson  
*Manager of Industry Relations & Government Affairs*  
Farmers Telecommunications Cooperative, Inc.  
144 McCurdy Avenue North  
Rainsville, Alabama 35986  
Telephone: (256) 638-2144  
Facsimile: (256) 638-4830  
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Enclosure  
cc: Cathy Davis  
FCC Enforcement Bureau  
Best Copy and Printing, Inc.

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

Re: **Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007  
EB Docket No. 06-36;**

**Form 499 Filer ID 803427-Farmers Telecommunications  
Cooperative, Inc.,  
Form 499 Filer ID 821126-Farmers Telecommunications  
Corporation, Inc., and  
Form 499 Filer ID 808824-Farmers Cellular Telephone, Inc.  
DBA Farmers Wireless**

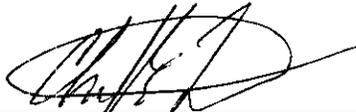
### CERTIFICATION

I, Christopher E. Townson, hereby certify that I am an officer of the companies named above, hereinafter referred to as "FTC", and acting as an agent of FTC that I have personal knowledge that FTC has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

I have personal knowledge that FTC obtains written approval for the use of its customers' CPNI and that FTC has notified its customers of their right to restrict FTC's use of, disclosure of and access to their CPNI prior to obtaining such written approval.

I have personal knowledge that FTC has implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the rules.



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Name: Christopher E. Townson  
Title: Assistant Secretary  
Date: February 28, 2008

Company Name ("Carrier"): Farmers Telecommunications Cooperative, Inc.  
Farmers Telecommunications Corporation, Inc.  
Farmers Cellular Telephone, Inc. DBA Farmers Wireless

Address: 144 McCurdy Avenue North  
P. O. Box 217  
Rainsville, AL 35986-0217

### STATEMENT

Carriers have established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carriers have implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carriers continually educate and train its employees regarding the appropriate use of CPNI. Carriers have established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carriers maintain a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carriers also maintain a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carriers have established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carriers took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: N/A.

- The following is information Carriers have with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: N/A.
  
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI:   0
  
  - Category of complaint:
    - N/A Number of instances of improper access by employees
  
    - N/A Number of instances of improper disclosure to individuals not authorized to receive the information
  
    - N/A Number of instances of improper access to online information by individuals not authorized to view the information
  
    - N/A Number of other instances of improper access or disclosure
  
  - Description of instances of customer complaints, improper access or disclosure:  
N/A.