

**Date: September 10, 2008**

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

**Re: EB Docket No. 06-36, Certification of CPNI filing - Calendar Year 2007**

Dear Ms. Dortch:

This letter serves as the below-named Companies "Certification of CPNI Filing for Calendar Year 2007", as ordered in EB Docket No. 06-36.

**Company Name: Manchester-Hartland Telephone Company**

**Address: 204 Railroad Street, Manchester, Minnesota 56007-5012**

**Form 499 Filer ID: 803733**

**Name and Title of Signatory: Omer D. Emstad, Manager**

I, Omer D. Emstad, certify that I am an officer of the company named above, and that, based on my personal knowledge and acting as an agent for the Company, the Company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's rules and Regulations, 47 C.F.R. ~ 64.2001 et seq., as revised.

The attached Statement demonstrates such compliance.

The Company had not taken any action (proceedings instituted or petitions filed by the Company at state commissions, the court system, or the FCC) against data brokers in the past year.

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



\_\_\_\_\_  
Company Officer

Dated: September 10, 2008

**Manchester-Hartland Telephone Company  
204 Railroad Street  
Manchester, Minnesota  
56007 - 5012**

**Tele. (507) 826-3212**

**Fax (507) 826-3678**

**The operating procedures of the Manchester-Hartland Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:**

**Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222 ©)(1) and (d).**

**Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.**

**Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.**

**Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online access, or in-store visit.**

**Our company discloses call detail information (CDI) in a customer-initiated call only; after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.**

**Our company discloses CPNI to a customer in person at our retail location only when the customer presents a valid photo ID and the ID matches the name on the account.**

**Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinary urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.**

**Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.**