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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 23, 2009

Name of company covered by this certification:

Ronan Telephone Company, A Mont Corp

Form 499 Filer ID: 809501

Name of signatory: Rosa E. Tougas

Title of signatory: President

I, Rosa E. Tougas, 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 Ronan Telephone 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.

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

Signed Rosa E. Tougas, President.

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**Statement of Company Procedures  
To Ensure Protection of  
Customer Proprietary Network Information (CPNI)  
47 C.F.R. § 64.2001 *et seq.*, FCC Rules, EB Docket 06-36  
February 20, 2009**

**Company Name:** Ronan Telephone Company, a Mont. Corp.  
**CPNI Contact Person:** Rosa E. Tougas  
**Telephone Number:** 406-676-2751  
**Email Address:** [ret101@ronan.net](mailto:ret101@ronan.net)  
**Affiliated Company:** Polson CommunityTel Inc., a Broadband Internet Service Provider

**Customer Notification**

Ronan Telephone Company (RTC) customers are regularly informed of their rights and RTC's obligation to protect their Customer Proprietary Network Information (CPNI) in compliance with 47 CFR §64.2005 - §64.2009. This is accomplished by:

- One-on-one explanation of customer rights when initiating service or upon request.
- Annual notification of customer rights and Company obligation.
- Notification of customer's right to "opt out" of Company use of CPNI.

**Identity and Use Verification**

Verification of the identity of the customer that has authorized access to account detail or general information is established by one of the following methods:

- Use of a customer-established valid username and password to access information via the Internet at the RTC website.
- Use of a Personal Identification Number (PIN) created by the responsible party or parties of record.
- Presentation of a photo ID, such as a valid driver's license, student ID or Tribal enrollment ID that matches the responsible party or parties of record.

Statement of Company Procedures-continued-Ronan Telephone Company, A Mont Corp

CPNI Use

RTC has procedures in place which in ensure that:

- CPNI is only used with permission of the customer.
- CPNI is not provided to unaffiliated or joint venture companies.
- CPNI is not shared with any third parties absent a court order or subpoena.
- CPNI is not used in any outbound telemarketing campaigns unless the service marketed is adjunct to services already provided to the customer.

Internal  
Safeguards and Training

Internal staff practices used to fulfill RTC's obligation to protect the customer's CPNI are:

- Formal staff training provided by the Company on CPNI regulations and related procedures in place to ensure compliance.
- Permission for use of CPNI for marketing readily available and clearly stated.
- Disciplinary action will be taken in response to improper use that can include termination of employment.
- Log maintained of any infraction of the policy including steps taken to prevent a recurrence of infraction.