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January 21, 2010

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission

Dear Ms. Dortch:

Enclosed is the required annual certification from Calaveras Telephone Company along with the required accompanying statement.

Respectfully submitted.

Kirby L. Smith
Director of Finance

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

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2009

Date filed: January 20, 2010

Name of company covered by this certification: Calaveras Telephone Company

Form 499 Filer ID: 821146

Name of signatory: James H. Tower

Title of signatory: President

I, James H. Tower, 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 the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) 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.

The company represents and warrants that the above certification is consistent with 47.C.F.R. & 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed James H. Tower

Attachment: Accompanying Statement explaining CPNI procedures

Accompanying Statement of Calaveras Telephone Company

Calaveras Telephone Company has established operating procedures to ensure compliance with the Federal Communications Commission's rules with respect to privacy and protection of Customer Proprietary Network Information ("CPNI"). The specific procedures taken include:

1. Calaveras Telephone Company has promulgated a written policy requiring all employees to refrain from disclosure of CPNI without prior authorization of the departmental supervisor and customer authentication in the event of a customer request for CPNI.
2. Calaveras Telephone Company has obtained the written acknowledgement of all employees that they understand and agree to comply with the policy described in item #1 above.
3. Calaveras Telephone Company has instituted a policy of providing training of all employees every other year so that they understand and are able to comply with the policy described in #1 above, and of requiring each employee to execute a new acknowledgement and agreement as described in item #2 above, on the same schedule, every other year.
4. Each new employee receives the training and executes the acknowledgement and agreement described in item #3 above, before being permitted to access CPNI.
5. Calaveras Telephone Company places all computer terminals with the capability to access CPNI in areas where close supervision is possible.
6. Calaveras Telephone Company does not provide call detail record CPNI over the phone in the course of a customer initiated call.
7. All employees are required to document in writing all releases of call detail record CPNI, and the reason for the releases, whether the releases are to a customer, an affiliate, a contractor, or joint venture partner, or another entity.
8. Calaveras Telephone Company has adopted a written personnel policy stating that any employee releasing CPNI without authorization is subject to discipline up to and including termination of employment, and has advised each employee of that policy in writing.
9. Calaveras Telephone Company reviews all releases of call detail record CPNI no less frequently than once every month to ensure compliance with all policies and law.
10. Calaveras Telephone Company uses the opt-out system of obtaining customer consent for use of CPNI for marketing. Notices are sent to customers every other year and records of all notices and responses are maintained securely. A record of all CPNI releases to third parties for marketing purposes is securely maintained, and such releases may be made only with the express approval of the employee's supervisor.

Additionally, Calaveras Telephone Company has promulgated training targeting supervisors, those employees with frequent public contact, and all employees to ensure a full and complete understanding of the importance of CPNI protections and to ensure full compliance with the law.

As a followup to all previous training for supervisors, customer service representatives and other employees, all employees recently received online CPNI training and have passed an online test indicating general understanding of the importance of CPNI.

Calaveras Telephone Company received no customer complaints concerning disclosure of CPNI during the year 2009. Calaveras Telephone Company took no action against any data brokers or pretexters during 2009.