FARMERS MUTUAL
Telephone Company

February 25, 2010

Via Electronic Filing

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

RE: EB Docket No. 06-36
Annual CPNI Certification – Farmers Mutual Telephone Company

Dear Secretary Dortch:

On behalf of Farmers Mutual Telephone Company ("Farmers"), enclosed for electronic filing is Farmer's annual 64.2009(e) CPNI Certification for 2010 covering calendar year 2009.

Sincerely,

Kris Radermacher

Kris Radermacher
Regulatory Manager

Attachment

cc: Best Copy and Printing, Inc.,
via email – FCC@BCPIWEB.com

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

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering calendar year 2009

Date Filed: February 22, 2010

Name of company covered by the certification: Farmers Mutual Telephone Company

Form 499 Filer ID: 801300

Name of signatory: LLOYD G. HANSON

Title of signatory: SECRETARY

I, Lloyd G. Hanson 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.

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 (*i.e.,* 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.

Lloyd G. Hanson

Signed

Attachments: Accompanying Statement explaining CPNI procedures

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

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date Filed: February 22, 2010

Name of company covered by the certification: Farmers Mutual Telephone Company

Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules and as referenced in the attached signed certification, Farmers Mutual Telephone Company, herein referenced as the Company hereby certifies that the Company, and its affiliates, is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company's board
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
    - Established an outbound marketing supervisory review process for the use of CPNI
    - Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
    - Disciplinary processes have been defined and are in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
    - All customers, during a customer-initiated telephone call, are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
    - Call detail is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested call detail:
        - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
        - Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change: customers are notified immediately when a customer creates or changes one of the following:
    - password
    - customer response to a back-up means of authentication for lost or forgotten passwords
    - online account
    - address of record
6. Notice of unauthorized disclosure of CPNI: a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
    - Customers are notified bi-annually of their rights for the use of their CPNI in marketing campaigns
    - New customers are notified of the opt-out procedure as a part of the customer sign-up process
    - Billing system displays customer's opting status
    - Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
    - Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
    - Company maintains security of all CPNI, including but not limited to:
        - Documents containing CPNI are shredded
        - Computer terminals are locked when employee is not at the station