February 8, 2011

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. 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 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Cumby Telephone Cooperative, Inc. (499 Filer ID # 804990), please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

Jean Langkop
Authorized Representative of
Cumby Telephone Cooperative, Inc.

JL/pjf

Attachments

cc: Best Copy and Printing, Inc (via email FCC@BCPIWEB.COM)
Ms. Karen Zimmerman, Cumby Telephone Cooperative, Inc.

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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 2011 covering the prior calendar year 2010

Date: February 8, 2011

Name of company covered by this certification:	Cumby Telephone Cooperative, Inc.
Form 499 Filer ID:	804990
Name of signatory:	Karen Zimmerman
Title of signatory:	General Manager

I, Karen Zimmerman, 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*. The company operates in the state of Texas under the name of Cumby Telephone Cooperative, Inc. as an incumbent local exchange carrier (ILEC) and a competitive local exchange carrier (CLEC). This certification is for both the ILEC and the CLEC. The officers and employees of the company are the same for the ILEC and CLEC.

Attached to this certification is an accompanying statement explaining how the 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 in the past year. The company is not aware of any attempts by pretexters to access the CPNI of company customers and therefore, has not had to take any actions against data brokers.

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 _____

Attachment: Accompanying Statement

Cumby Telephone Cooperative, Inc. (ILEC) and
Cumby Telephone Cooperative, Inc. (CLEC)

ACCOMPANYING STATEMENT

This statement explains how Cumby Telephone Cooperative, Inc.'s ("the Company") procedures ensure compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has chosen to prohibit the use or release or CPNI for marketing purposes by itself and between its affiliates.

The Company has a written CPNI policy that explains what CPNI is, when it may be used without customer approval, and when customer approval is required prior to CPNI being used, disclosed or accessed. The Company has trained its employees about CPNI and when they are and are not authorized to use CPNI. The Company's CPNI policy describes the disciplinary process related to noncompliance with CPNI obligations, and possible disciplinary action up to and including termination of employment.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any CPNI breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules including records of any discovered breaches. Records of any CPNI breach and notifications to law enforcement, as well as law enforcement's responses are maintained for a period of at least two years.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010, including, but not limited to the following: Although the Company has not implemented passwords for authentication purposes, call detail information is not discussed with a customer on a customer-initiated call unless the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide sufficient information about the call in question, call detail information is shared only by (1) calling the customer back at the telephone number of record; or (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D. matching the name on the customer's account. On a customer-initiated call, non-call detail information can only be

discussed after the customer is authenticated using standard procedures, such as personally-identifiable information noted on the account records.

Currently, the Company's customers do not have online access to their accounts. If this changes in the future, the Company will implement authentication procedures for online access to CPNI in accordance with § 64.2010(c) and (e).

The Company has implemented procedures to immediately notify a customer whenever an address of record is created or changed.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, the Company has not and does not plan to release CPNI to any third parties for marketing purposes.

In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement (i.e., United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI)) and customers.