PARK REGION
Mutual Telephone Co.

OTTER TAIL TELCOM

Park Region Telephone
PO Box 277
100 Main St.
Underwood, MN 56586
218-826-6161

Otter Tail Telcom
230 W Lincoln
Fergus Falls, MN 56537
218-998-2000

Valley Telephone
PO Box 277
Underwood, MN 56586
800-247-2706

February 10, 2011

By Electronic Filing

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

EB Docket No. 06-36

RE: Annual Certification of CPNI Compliance Filing for 2010

Company Name	499 Filer ID
Park Region Mutual Telephone Company	801786
Otter Com, Inc.	825338
Otter Tail Telcom, LLC	819382
Valley Telephone Company	803127

Dear Ms. Dortch:

Please find the attached "2010 CPNI Compliance Certification" filing for the companies listed above. This packet includes the CPNI Certification and the statement of procedures for operational compliance with the FCC's CPNI rules. The filing was performed electronically on February 10th , 2011.

If you have any questions regarding this filing, please give me a call at (218) 826-8311.

Sincerely,

Dave Bickett
GM/CEO

Enclosure:

Cc: Best Copy and Printing, Inc. via email to FCC@BCPIWEB.COM

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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 2010 covering the prior calendar year 2010

1. Date filed: February 10, 2011

2. Name of company(s) covered by this certification:

Company Name	499 Filer ID
Park Region Mutual Telephone Company	801786
Otter Com, Inc.	825338
Otter Tail Telcom, LLC	819382
Valley Telephone Company	803127

3. Name of signatory: Dave Bickett

4. Title of signatory: GM/CEO

5. Certification:

I, Dave Bickett, certify that I am an officer of the affiliated companies named above (collectively and individually "Company"), 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 (*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.

Signed _____

Attachments: Accompanying Statement explaining CPNI procedures

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Statement of Compliance Procedures for Customer Proprietary Network Information

1. Establishment of customer identity.
   - Customers are required to establish non-life-history-related passwords in order to gain access to information.
   - Company representative may verify customer identity by calling the customer back at the number of record or by verify identity via proof of valid photo ID matching the customer's account information.
   - Bill copies will only be provided via sending to the address of record either by postal or electronic form or in person with proof of valid photo ID. Further call detail requires court order.
2. Notification of customer account changes.
   - Customers are notified by company letter, text message, or voicemail of any changes of CPNI information.
3. Establishment of customer approval for CPNI use in Marketing.
   - Beginning in January 2003 and every other January thereafter, the company (a) provides notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008.
   - All new customers will be required to consent or reject to the use of their CPNI at the time of application for service. A written signature on the application serves as verification. The detailed opt-out notice, Exhibit A, will be mailed in new customer welcome packets as a further courtesy notice.
   - Customer consent or rejection of CPNI use is flagged in the billing system customer master file.
4. Training of company personnel.
   - 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.
   - Failure of any staff member to seek approval and/or comply with CPNI guidelines will be subject to disciplinary action pursuant to Company Policy 3.005.
5. Records of CPNI use or disclosure.
   - Business Operations Manager must give prior approval for any sales/marketing campaigns which plan to utilize CPNI.
   - Business Operations Manager shall be responsible to maintain records for any sales/marketing campaigns which utilize CPNI for at least one year.
   - Business Operation Manager shall be responsible to approve and maintain record of any instance where CPNI is disclosed to a 3rd party.
   - Business Operations Manager and CPNI Compliance officer shall be responsible for annual review process of the compliance with CPNI rules.
6. Notification of Breach.
   - 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.

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