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FEB 17 2011

**Mulberry Cooperative Telephone Co., Inc.**

123 S Glick St.  
Mulberry, IN 46058

MULBERRY COOPERATIVE TELEPHONE CO., INC.  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 Statement of Compliance

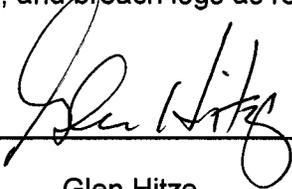
1. I, Glen Hitze, certify that I am the CPNI Compliance Officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.
2. I have personal knowledge of the facts stated in this Certification of Compliance. I am responsible for overseeing compliance with the FCC rules relating to Customer Propriety Network Information (CPNI).
3. The Company has an established system which the status of the customer's approval for the use of CPNI can clearly be established prior to the use or release of CPNI.
4. The Company has an updated CPNI policy manual and trains its personnel on the company and FCC policies, definitions, authorized and un-authorized use of, reporting requirements, documentation, and disciplinary processes of CPNI as established by the FCC.
5. It is the Company's policy to maintain records of its own sales and marketing campaigns that use CPNI. The Company maintains records of its affiliates sales and marketing campaigns that use CPNI. The Company maintains records of all instances where CPNI was disclosed of provided to third parties.
6. The Company has a supervisory review process regarding compliance with the FCC's rules relating to the protection of CPNI. The purpose of the review process is to ensure compliance with all rules prior to using CPNI for the purpose which customer approval is required. Company personnel, prior to using CPNI, must first consult with myself or Randy Maish, General Manager, regarding the lawfulness of using CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is permissible, either I or Randy Maish consult the current FCC CPNI regulations, the FCC's compliance guide, and if necessary, legal counsel. The Company's personnel must obtain supervisory approval from either Randy Maish or I regarding any proposed use of CPNI.
7. Randy Maish and I personally oversee the use of opt-in, opt-out or any other approval requirements, disclosure requirements and notice requirements as required by the FCC regulations. We also review all notices required by the FCC to maintain compliance.

No. of Copies rec'd 0+4  
List A B C D E

8. Randy Maish and I ensure the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

9. It is the Company's policy to maintain records of Customer approval for use of CPNI, Opt-In/Opt-Out, Customer notifications, and breach logs as required by the FCC regulations.

CPNI Compliance Officer: \_\_\_\_\_



February 10, 2011

Glen Hitze

**Mulberry Cooperative Telephone Co., Inc.**  
123 S Glick St.  
Mulberry, IN 46058

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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.

1. Date filed: February 10, 2011
2. Name of company covered by this certification: Mulberry Cooperative Telephone Co., Inc.
3. Form 499 Filer ID: 808299
4. Name of signatory: Glen Hitze
5. Title of signatory: CPNI Compliance Officer
6. Certification:

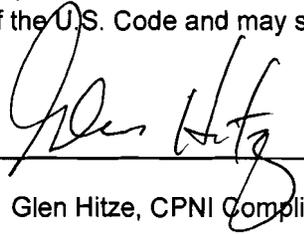
I, Glen Hitze, certify that I am an officer of the company named above, and acting as an agent for the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

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, record keeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions against data brokers in the past year.

The company has not received 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  February 10, 2011

Glen Hitze, CPNI Compliance Officer

Attachments: Accompanying Statement explaining CPNI procedures.

**Mulberry Cooperative Telephone Co., Inc.**  
123 S Glick St.  
Mulberry, IN 46058

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MULBERRY COOPERATIVE TELEPHONE CO., INC.  
CPNI Compliance Office Certification

I, Glen Hitze, hereby acknowledge that I fully understand Mulberry Cooperative Telephone Co., Inc. obligations under the Customer Proprietary Network Information (CPNI) Federal Communications Commission (FC) rules and I do have personal knowledge of Mulberry Cooperative Telephone Co., Inc. operating procedures for the protection of CPNI. I have completed training on the CPNI rules and thoroughly understand Mulberry Cooperative Telephone Co., Inc CPNI Manual. I understand the CPNI rules and will go above and beyond the FCC mandated rules to help protect CPNI.

CPNI Compliance Officer:  February 10, 2011  
Glen Hitze

Approved By:  February 10, 2011  
Gerry Neal, President

**GRIDLEY**  
**TELEPHONE**

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02/14/2011

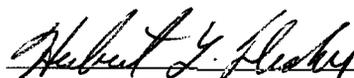
Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S. W., Suite CY-B402  
Washington, D.C. 20554

**RE: Certification of CPNI Filing, March 1, 2011**  
**FCC Docket EB 06-36**  
**EB-06-TC-060**  
**GRIDLEY TELEPHONE COMPANY:**

In accordance with the Public Notice issued by the Enforcement Bureau on February 2, 2006 (DA 06-258), please find attached **Gridley Telephone Company** annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI)

Should you have any questions regarding this filing, please direct them to the undersigned at (309) 747-2221 or email [hflesher@gridtel.com](mailto:hflesher@gridtel.com).

Sincerely,

  
HERBERT L. FLESHER

GENERAL MANAGER

GRIDLEY TELEPHONE COMPANY

Cc: Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554

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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 filed: February 09, 2011

Name of company(s) covered by this certification: Gridley Telephone Company

Form 499 Filer ID: 803121

Name of signatory: Herbert L. Flesher

Title of signatory: General Manager

I, Herbert L. Flesher, 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 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 actions.

GRIDLEY TELEPHONE COMPANY

Signed Herbert L. Flesher  
Herbert L Flesher  
Vice President and General Manager  
PO Box 129  
Gridley, IL 61744  
309 747-3780

**Attachment A**  
**Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of Gridley Telephone Co. (Form 499 Filer ID No.803121) (the "Company") ensure that the Company complies with Part 64, Section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.