COOPERATIVE TELEPHONE EXCHANGE

(SERVING KAMRAR AND STANHOPE)
P.O. BOX 95
STANHOPE, IOWA 50246
515-826-3206

January 25, 2012

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 Filing 2011

Dear Ms. Dortch:

Enclosed please find the Annual 47 C.F.R. § 64.2009(e) CPNI Certification and attachments for 2012 covering the prior calendar year 2011.

If you have any questions, please feel free to contact me.

Sincerely,

Marvin Ness
President, Board of Directors
Cooperative Telephone Exchange

cc: Best Copy and Printing, Inc. - via e-mail 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 2012 covering the prior calendar year 2011

Date filed: January 25, 2012

Name of company(s) covered by this certification: Cooperative Telephone Exchange

Form 499 Filer ID: 807981

Name of signatory: Marvin Ness

Title of signatory: President, Board of Directors

I, Marvin Ness, 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 (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

Marvin Ness signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 §64.2009, on behalf of Cooperative Telephone Exchange. This Certificate of Compliance addresses the requirement of FCC's (CFR) Title 47 §64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 §64.2001-.2011.

On behalf of the Company, I certify as follows:

1. I am the President of the Company. My business address is:
   425 Parker Street PO Box 95 Stanhope, IA 50246-0095

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).

3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h) (1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Roger F. Anderson, the Company's Customer Service Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.

5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sale and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.

6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.

7. The Company's policy to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES (Cont'd)

8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Roger Anderson regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Roger Anderson or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sale personnel must obtain supervisory approval from either Roger Anderson or I regarding any proposed use of CPNI.

9. Further, both Roger Anderson and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.

10. Roger Anderson and I also ensure that 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.

11. Both Roger Anderson and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.

Signature

Cooperative Telephone Exchange
Company

1-24-2012
Date

ACTION(S) TAKEN AGAINST DATA BROKERS

Filing Date	Filed With (State Commission, FCC, Courts)	Explanation
	NONE	

CUSTOMER COMPLAINTS REGARDING CPNI

Date	Description of Complaint	Action Taken
	NONE	

Signature

Cooperative Telephone Exchange
Company

1-24-2012
Date