BRAZOS Telecommunications, Inc.
Keeping You Connected!

109 N. Avenue D
Olney, Texas 76374
940-873-4303
(Olney) 940-564-5659

Received & Inspected

FEB 16 2012

FCC Mail Room

February 15, 2012

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

Re: CPNI Certification and Accompanying Statement
EB Docket No. 06-36

Dear Ms. Dortch:

Please find attached the CPNI certification and accompanying statement of compliance for 2011 for Brazos Telecommunications, Inc., which is being filed pursuant to Section 64.2009(e) of the Commission's Rules.

Should you have any questions or need further information, please contact me at 1-800-687-3222.

Sincerely,

Kay Madera

Kay Madera
Commercial Supervisor

Attachments

Cc: Best Copy and Printing, Inc (Scanned & emailed to: FCC@BCPIWEB.COM)

No. of Copies rec'd 0
List ABCDE

Received & Inspected

FEB 16 2012

FCC Mail Room

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: February 15, 2012

Names of company covered by this certification: Brazos Telecommunications, Inc.

Form 499 Filer ID: 811130

Name of signatory: Richard D. Adams

Title of signatory: Executive V.P./General Manager

I, Richard D. Adams, 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 is not aware of any attempts by pretexters to access the CPNI of Company customers and has not had to take any actions against data brokers.

The Company has not received any customer complaints in the past year (2011) 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 misrepresentation to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Richard D. Adams

Attachment: Accompanying Statement

STATEMENT OF COMPLIANCE WITH THE FCC'S CPNI RULES

To the best of my knowledge, Brazos Telecommunications, Inc., (the Company") is in full 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 internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Company has an express disciplinary process in place, and any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.

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: Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls, during business office visits, or through online account access. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords has been implemented. Passwords and back-up authentication procedures are established in accordance with § 64.2010(e). Authentication procedures for customers prior to allowing customer access to online account CPNI have been established in compliance with §64.2010(c). The Company has implemented procedures to notify customers immediately whenever a password, customer response to a back-up authentication questions for lost or forgotten passwords, online account, or address of record is created or changed. When an address of record is changed the notification is mailed to the prior address of record.

The Company provides notice to the customer of their right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Company is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Company. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval.

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, currently the Company has no joint venture partner and does not release CPNI to any third parties for marketing purposes.

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 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, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years.