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February 23, 2012

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

re: EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of St. Paul Cooperative Telephone Association, Form 499 Filer ID 802479 pursuant to §64.2009(e) of the Commission's rules, I am attaching the CPNI Compliance Certificate and the Accompanying Statement as required.

Please contact me with any questions at 503-612-4400.

Sincerely,

Carsten Koldsbaek
Consulting Manager

Enclosures

Copies to:
Federal Communications Commission
Enforcement Bureau
445 – 12th Street SW
Washington, DC 20554

Best Copy & Printing Inc.
445 – 12th Street, Suite CY-B402
Washington, DC 20554

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

1. Date filed : February 23, 2012

2. Name of company(s) covered by this certification: St. Paul Cooperative Telephone Association

3. Form 499 Filer ID: 802479

4. Name of signatory: Nick L. Schneider

5. Title of signatory : Secretary Treasurer

6. Certification :

I, Nick L. Schneider, 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 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 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

CPNI Compliance Accompanying Statement:
Year: 2012 covering the prior calendar year 2011

St. Paul Cooperative Telephone Association

This accompanying statement explains how St. Paul Cooperative Telephone Association's operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

St. Paul Cooperative Telephone Association adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of St. Paul Cooperative Telephone Association's policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

St. Paul Cooperative Telephone Association has on file with the FCC its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.