Project
Telephone Company
TOTAL TELECOMMUNICATIONS

Filed Electronically Via ECFS 2/24/2012
EB DOCKET NO. 06-36

February 24, 2012

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

Reference: EB-06-TC-060
Certification of CPNI Filing of Project Telephone Company
499 Filer ID 801588

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Project Telephone Company (499 Filer ID 801588) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006 and FCC 07-22 released on April 2, 2007.

Please contact me with any questions or concerns.

Sincerely,

Mike Kilgore
CEO
Phone: 406-783-2200
E-mail: mike.kilgore@nemont.coop

HIGHWAY 13 SOUTH ■ P.O. BOX 600 ■ SCOBEY, MONTANA 59263-0600
(406) 783-5659 ■ 1-800-275-6002 ■ FAX (406) 783-5283

Project
Telephone Company
TOTAL TELECOMMUNICATIONS

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: **02/24/2012**
2. Name of company(s) covered by this certification: ***Project Telephone Company***
3. Form 499 Filer ID: ***801588***
4. Name of signatory: ***Mike Kilgore***
5. Title of signatory: ***CEO***
6. Certification:

I, Mike Kilgore, 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

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Before the
Federal Communications Commission
Washington, D.C. 20554

CPNI Compliance Certification As Required by FCC Enforcement Bureau, DA 06-223	)))	**EB-06-TC-060, EB Docket No. 06-36** Project Telephone Company 499 Filer ID 801588

PROJECT TELEPHONE COMPANY
CERTIFICATION OF CPNI COMPLIANCE
FOR THE 2011 CALENDAR YEAR

OPERATING PROCEDURES STATEMENT

1. Customer account prominently displays "**Opt Out**" so that employees viewing customer information can readily identify customers opting to restrict use of their CPNI. When calls are received from customers with this preferred treatment, employees ask for customer permission to access account information.

2. The Company uses "opt-out approval" as the method to obtain customer consent to use, disclose, or permit access to the customer's CPNI. Customers may "opt-out" at any time.

3. Notice regarding customer CPNI rights and The Company's duty to protect CPNI will be provided to all new and existing customers in the next printed telephone directory issued by THE COMPANY. In addition, customers will be notified periodically, by one or more of the means listed: bill stuffers, bill messages, separate mailings, and/or Nemont Today.

4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally, procedures are documented and readily available to all employees.

5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.

6. All marketing campaigns and materials are reviewed by the CPNI Compliance Officer or a designated representative. This will include any use of CPNI data used in any given marketing effort. The proper safeguards are in place should The Company use CPNI data to target market to customers.

7. Improper use or disclosure of CPNI is subject to The Company's work rules and disciplinary policies as outlined in its employee handbook. The employee handbook is readily accessible by all employees.

8. Valid photo identification is required when customers come into any of our retail store locations requesting assistance/access to any account information.

9. Release of any CPNI information requested by the customer via a telephone call is prohibited, with the following exceptions: the requesting individual provides the password of record; or, the information is sent via United States Postal Service (USPS) mail to the customer's address of record. The customer is also referred to the e-bill site.

10. The Company does not currently, and has no plans, to provide CPNI to a third party for the purposes of marketing.

11. Customer initiated changes in passwords or addresses or security questions used as authentication result in a generic notification to the customer using the address of record consistent with FCC rules.

12. On-line access to CPNI is compliant with the FCC password requirements.