GVNW CONSULTING, INC.

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February 27, 2012

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

RE: EB Docket No. 06-36, Annual 47 C.F.R. § 64.2009(e) CPNI Certification Filing for Dell Telephone Cooperative, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of Dell Telephone Cooperative, Inc. (499 Filer ID No. 808560) for 2011 in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 28, 2011 (DA 11-159 and Enforcement Advisory No. 2011-02). The Enforcement Bureau has requested the filing of the compliance certificate as required by 47 C.F.R. §64.2009(e).

Please contact me at 830-895-7233 or jmiller@gvnw.com with any questions or concerns.

Sincerely,

James A. Miller
Authorized Representative for
Dell Telephone Cooperative, Inc.

cc: Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 27, 2012

Name of Company: Dell Telephone Cooperative, Inc.

Form 499 Filer ID: 808560

Name of signatory: Denny Bergstrom

Title of signatory: General Manager

I, Denny Bergstrom, certify that I am an officer of the cooperative named above, and acting as an agent of the cooperative, that I have personal knowledge that the cooperative 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 cooperative's procedures ensure that the cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance).

The cooperative has not taken any actions (*i.e.*, proceedings instituted or petitions filed by the cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The cooperative does not have any information that pretexters have attempted to gain access to CPNI.

The cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

Signed: Denny Bergstrom
Denny Bergstrom

Attachment: Accompanying Statement of CPNI Compliance and Procedures

DELL TELEPHONE COOPERATIVE, INC.
STATEMENT OF COMPLIANCE and PROCEDURES
For Year Ending 2011
Form 499 Filer ID: 808560

1. This Statement of Compliance for Dell Telephone Cooperative, Inc. ("Dell" or "the Cooperative") is attached to and referenced within the Cooperative's 2011 Annual CPNI Certification.

2. Dell has conducted CPNI training for all of its employees with special emphasis training for any employee that has access to CPNI. All employees have acknowledged their understanding of the requirements for the safeguarding of CPNI and the disciplinary actions that will be taken for the unauthorized access, breach, release or usage of CPNI.

3. The Cooperative has and maintains copies of the FCC's CPNI Rules in addition to its own internal CPNI Policies and Guidelines (CPNI Manual). The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and acknowledged by all cooperative employees.

4. For year ending 2011, Dell is not aware of any incidence involving the access, breach, release or usage of its CPNI by any unauthorized person or entity; i.e., data broker or pretexter.

5. For year ending 2011, Dell has not received any customer complaints concerning the unauthorized access, breach, release or usage of CPNI.