February 14, 2013
Via ECFS Filing

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

RE: Cooperative Communications, Inc.
CPNI Certification EB Docket No. 06-36; CY2012

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Cooperative Communications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas
Sharon Thomas
Consultant to Cooperative Communications

cc: Karen McDine - Cooperative
file: Cooperative - FCC - Other
tms: FCx1301

Enclosures
ST/im

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification	Covering calendar year 2012
Name of company(s) covered by this certification:	Cooperative Communications, Inc.
Form 499 Filer ID:	805020
Name of signatory:	Louis A. Lombardi, Jr.
Title of signatory:	Chief Operating Officer

1. I, Louis A. Lombardi, Jr., 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.*

2. 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 §64.2001 *et seq.* of the Commission's rules.

3. 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.

4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

5. 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.

Louis A. Lombardi, Jr., Chief Operating Officer

2/13/13

Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

COOPERATIVE COMMUNICATIONS, INC.
CPNI OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH
47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001- 2012

Cooperative Communications, Inc. ("Cooperative" or "the Company") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in 47 C.F.R. §§ 64.2001- 64.2012 of the Commission's CPNI rules, as modified by the Commission in 2007.

CONFIDENTIALITY OF CARRIER INFORMATION

The Company only uses proprietary information obtained from another carrier for purposes of providing a telecommunications service for that distinct purpose, and does not use such information for its own marketing efforts.

COMPANY SERVICES PROVISION

Cooperative Communications, Inc. ("the Company") is a competitive local exchange carrier, an interexchange long distance service provider, and an information service provider.

CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

SAFEGUARDING AGAINST PRETEXTING

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC if it discovers any new methods of pretexting and of any actions it takes against pretexters and data brokers.

UTILIZATION OF CPNI

(1) The Company obtains and utilizes CPNI for the purpose of providing local and interexchange telecommunications services and and information services to its customers, billing its customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.

(2) The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005.

(3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call

competing service providers or for any other purpose that is prohibited by the FCC's rules.

CPNI DISCLOSURE TO THIRD-PARTIES

The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request after authentication of the customer's identity, as described below.

CUSTOMER AUTHENTICATION

All customer information is maintained in a password-protected database that can be accessed only by authorized employees such as dedicated account representatives. Authorized employees may access CPNI to address customer questions only when the person calling is listed as an "authorized contact" for the business customer. Changes to and release of information for customer account records such as address, phone numbers or services must be requested by an authorized customer contact in accordance with the provisions of the customer's contract. All such requests are verified by the Company. The Company has not implemented passwords for telephone inquiries; therefore, it is the Company's policy and practice to release call detail information based on customer-initiated telephone contact only if (1) a customer requests that the information be sent to the customer's address of record; or (2) the Company calls the telephone number of record and discloses the information, or (3) the customer can provide specific details of the call relevant to the customer service issue. If the customer cannot provide the relevant call detail information, the Company only provides the call detail information by calling the customer at the telephone number of record or mailing the information to the address of record.

The Company does not currently provide online access to customers, nor does it have any retail locations.

TRAINING AND DISCIPLINE

The Company prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law. The Company trains its employees in the authorized use of all customer information including CPNI. Any employee that discloses confidential customer information including CPNI is subject to disciplinary action and possibly termination.

NOTICE OF UNAUTHORIZED DISCLOSURE OF CPNI

The Company has implemented processes to ensure that appropriate notice to law enforcement and the customer is given in the event of a CPNI breach, consistent with FCC requirements. Specifically, as soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, the Company will provide electronic notification of the breach within seven business days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") via the following web site, www.fcc.gov/eb/CPNI/. In order to allow law enforcement time to conduct investigation, the Company will wait another seven business days before notifying the affected customers of the breach (unless the USSS and FBI request the Company to postpone disclosure). The company may notify customers sooner if there is a risk of immediate and irreparable harm. The Company will maintain records of discovered breaches for at least two years. Notifications to law enforcement and customers as well as record retention are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

No breaches occurred during 2012.

ADDITIONAL SAFEGUARDS

- The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.

- The Company designates one or more officers, as an agent or agents of the Company, to sign and file a CPNI compliance certificate on an annual basis.

OTHER

- The Company has not taken any actions against data brokers in the past year.

- The Company did not receive any customer complaints about the unauthorized use of CPNI or the unauthorized disclosure of CPNI during calendar year 2012.