



March 1, 2013  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**RE: Cooperative Light & Power Association of Lake County**  
CY2012 Annual CPNI Certification Filing  
EB Docket No. 06-36

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 Light & Power Association of Lake County.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

/s/Robin Norton

Robin Norton

Consultant to Cooperative Light & Power Association of Lake County

cc: Kevin Olson - Coop Light & Power (via email)  
file: Coop Light & Power - FCC  
tms: FCCx1301

Enclosures  
RN/lm

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 for 2013:      Covering calendar year 2012  
Name of company(s) covered by this certification:      Cooperative Light & Power Association of Lake  
County, Inc.  
Form 499 Filer ID:      824274  
Name of signatory:      Steve Wattnem  
Title of signatory:      General Manager

1. I, Steve Wattnem, 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 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.

  
\_\_\_\_\_  
Steve Wattnem, General Manager  
Cooperative Light & Power Association of Lake County, Inc.  
2/26/13  
\_\_\_\_\_  
Date

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**Statement of CPNI Procedures and Compliance  
For 2012  
Cooperative Light & Power Association of Lake County, Inc.**

Cooperative Light & Power Association of Lake County, Inc. is a rural electric cooperative serving two counties in Minnesota. We also offer resold long distance service to fewer than 800 customers. We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our employees have been trained not to use CPNI for marketing purposes. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have instituted authentication procedures to safeguard the disclosure of call detail over the telephone and to protect against attempts by third parties to gain unauthorized access to customer CPNI. Our customer service representatives will only discuss our customers' bills once the customer has specifically identified and provided the information in question. Alternatively, we will call the customer back at the phone number of record or mail to the address of record. Our two customer service representatives receive annual training regarding CPNI rules and internal compliance procedures.

We do not disclose CPNI on-line. If we elect to do so in the future, we will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

When changes to customer information are requested, customers are notified by mail of the requested change, which is sent without revealing the changed information or sending the notification to the new account information.

We will CPNI in-store upon presentation of a valid photo ID that matches the account information.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2012.

We do not have any information with respect to the processes pretexters may use to attempt to access CPNI.