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February 23, 2014

FILED ELECTRONICALLY

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

Re: EB Docket No. 06-36
Annual Section 64-2009(e) CPNI Certification
McDonald County Telephone Company (499 Filer ID: 802914)

Dear Ms. Dortch:

On behalf of McDonald County Telephone Company ("McDonald") and pursuant to 47 C.F.R. Section 64.2009(e) of the Commission's rules, I am attaching McDonald's Annual CPNI Certification and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

Adam Holstun
Consultant

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 23, 2014

Name of company covered by this certification: McDonald County Telephone Company

Form 499 Filer ID: 802914

Name of signatory: Ross M. Babbitt

Title of signatory: President

I, Ross M. Babbitt, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

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

Signed Ross M. Babbitt

Ross M. Babbitt

CPNI Compliance Accompanying Statement:

Year: 2013

McDonald County Telephone Company

This accompanying statement explains how McDonald County Telephone Company'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.

McDonald County Telephone Company 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 McDonald County Telephone Company'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.

McDonald County Telephone Company has on file with the FCC (as of March 1, 2008) 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.