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February 6, 2014

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Peoples Telephone Cooperative, Inc., please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 652-7730.

Sincerely,

Stuart Polikoff
Authorized Representative of
Peoples Telephone Cooperative, Inc.

SP/pjf

Attachments

cc: Mr. Steven Steele, Peoples Telephone Cooperative, Inc.
Ms. Gena von Reyn, Peoples Telephone Cooperative, Inc.

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

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Date: February 6, 2014

Name of company covered by this certification: Peoples Telephone Cooperative, Inc.

Form 499 Filer ID: 803007

Name of signatory: Steven Steele

Title of signatory: General Manager

I, Steven Steele, 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.

The Cooperative has not taken any actions (proceedings instituted or petitions filed by a cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

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

The Cooperative 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 Cooperative 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 _____

Attachment: Accompanying Statement of Compliance explaining CPNI procedures

Peoples Telephone Cooperative, Inc.
Accompanying Statement of Compliance

Peoples Telephone Cooperative, Inc. ("the Cooperative") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Cooperative's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.

The Cooperative has designated a Director for CPNI compliance who is responsible for communicating with the Cooperative's attorney and/or consultants regarding CPNI responsibilities, requirements and restrictions; supervising the training of the Cooperative employees who use or have access to CPNI; supervising the use, disclosure, distribution or access to the Cooperative's CPNI by independent contractors and joint venture partners; maintaining records regarding the use of CPNI in marketing campaigns; and receiving, reviewing and resolving questions or issues regarding the use, disclosure, distribution or provision of access to CPNI.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010. Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls or business office visits. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords have been implemented. Passwords and back-up authentication security questions are established in accordance with §64.2010(e). Call detail information is not discussed with a customer on a customer-initiated call unless the customer can provide a pre-established password, or the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide a password or specific details of the call, call detail information can be shared only by (1) calling the customer back at the telephone number of record; (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D.

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Company's Employee Handbook includes

disciplinary actions related to the misuse of CPNI. Any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.

The Cooperative complies with the FCC's rules regarding the notification of law enforcement and customers, in the event of a CPNI breach. The Cooperative maintains a record for at least two years of any breaches discovered, notifications made to law enforcement (i.e., United States Secret Service and the Federal Bureau of Investigation) and customers, and responses from law enforcement.

It is the Cooperative's policy not to disclose or provide access to CPNI to Joint Venture partners or independent contractors for marketing purposes. Currently the Cooperative has no Joint Venture partners; however, if that changes in the future and the Cooperative decides to share customers' CPNI for marketing purposes, CPNI will be shared only of those customers who have given express consent (opt-in approval) to do so.

The Cooperative does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009(c)(d) and (f).