Santa Rosa Communications, Ltd.
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Vernon, Texas 76385-2128
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February 20, 2014

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

Re: 2013 Annual CPNI Certification and Accompanying Statement of Santa Rosa Communications, LTD EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), Santa Rosa Communications, LTD hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission please contact the undersigned.

Sincerely,

Kirk H. Petty

Kirk H. Petty
Santa Rosa Communications LTD
President

cc: Best Copy and Printing, Inc.

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

EB Docket 06-36

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

1. Date filed: February 20, 2014
2. Name of company(s) covered by this certification: Santa Rosa Communications, LTD
3. Form 499 Filer ID: 818836
4. Name of signatory: Kirk H. Petty
5. Title of signatory: President
6. Certification:

I, Kirk H. Petty, certify that I am an officer of Santa Rosa Communication, LTD; 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 through 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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

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.

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

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.

Signed Kirk H. Petty

Attachments: Accompanying Statement explaining CPNI procedure

STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

Santa Rosa Communications LTD's operating procedures ensure that Santa Rosa Communications LTD 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, customer password, and use of back-up authentication through customer answered questions, 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. Customer notification letters are sent when customer account changes occur to the authentication process including password, customer's use of back-up authentication questions for lost or forgotten passwords, and address of records changes.

Santa Rosa Communications LTD has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of Santa Rosa Communications LTD that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have 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. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has not taken any action against data brokers during the preceding year regarding unauthorized release of CPNI; nor has the Company received any customer complaints concerning the unauthorized access to or unauthorized disclosure of CPNI. The Company has implemented safeguard procedures to protect our customers' CPNI from pretexters including, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 C.F.R. §64.2010. We have established a notification/record keeping process for both law enforcement and customers in the event of a CPNI breach.

Santa Rosa Communications LTD for marketing purposes, uses customer billing name and address without disaggregation based on CPNI. If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards and supervisory review process will be taken as set forth in 47 C.F.R. §64.2009.