February 27, 2014

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

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36
Annual 64.2009(e) CPNI Certification for 2013
Date filed: February 27, 2014
Name of Company covered by this certification: Niagara Community TV Cooperative and affiliates
Form 499 Filer ID: 828418
Name of signatory: Linda Ponzio
Title of signatory: Operating Manager

Dear Ms. Dortch:
I, Linda Ponzio, 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 Customer Proprietary Network Information ("CPNI") rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is a compliance statement explaining how the company's procedures ensure that it 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 at either state commissions, the court system, or at the Commission) 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.

If any further information is required, please contact me or our regulatory counsel Kristopher Twomey at 202 681-1850 or by email at kris@lokt.net.

Sincerely,
Linda Ponzio
Linda Ponzio, Operating Manager

CPNI Compliance Statement and Operating Procedures of Niagara Community TV Cooperative

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)("EPIC CPNI Order"),[1] Linda Ponzio, Operating Manager of the Niagara Community TV Cooperative and affiliated entities makes the following statement:

Niagara Community TV Cooperative has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Niagara Community TV Cooperative is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize Niagara Community TV Cooperative's policies and procedures designed to safeguard CPNI.

Niagara Community TV Cooperative has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Niagara Community TV Cooperative is engaged in training their personnel as to when they are and are not authorized to use CPNI, and Niagara Community TV Cooperative has an express disciplinary process in place.

Niagara Community TV Cooperative uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Niagara Community TV Cooperative does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. Niagara Community TV Cooperative has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Niagara Community TV Cooperative has established procedures to verify an incoming caller's identity. Niagara Community TV Cooperative trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in Niagara

[1] 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

Community TV Cooperative's CPNI Manual. Niagara Community TV Cooperative also limits the number of employees that have access to customer information and call data.

Niagara Community TV Cooperative has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Niagara Community TV Cooperative also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service and the Federal Bureau of Investigation in accordance with the FCC's rules. Niagara Community TV Cooperative will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

Niagara Community TV Cooperative has not taken any actions (proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access Niagara Community TV Cooperative's CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

Niagara Community TV Cooperative annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

Linda Ponzio

Linda Ponzio

Operating Manager