

EB Docket No. 06-36

**CERTIFICATION OF CPNI FILING FOR 2018**  
**PURSUANT TO 47 C.F.R. §64.2009(e)**  
**Form 499 Filer ID No. 804648**

January 7, 2019

I certify that I am an officer of Panhandle Telecommunication Systems, Inc. d/b/a PTCI; and I have personal knowledge that Panhandle Telecommunication Systems, Inc. has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Shawn Hanson  
Officer's Printed Name

Shawn Hanson  
Officer's Signature

CEO  
Title

1/7/2019  
Date

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

Panhandle Telecommunication Systems, Inc.'s operating procedures ensure that Panhandle Telecommunication Systems, Inc. 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.

Panhandle Telecommunication Systems, Inc. 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 Panhandle Telecommunication Systems, Inc. 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.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.