



January 2, 2018

Office of the Attorney General
Consumer Interests Section
State of Georgia
40 Capitol Square SW
Atlanta, Georgia 30334

In Re: Compliance with O.C.G.A. Section 46-5-212
Customer Proprietary Network Information ("CPNI")

To Whom It May Concern:

In accordance with O.C.G.A. Section 46-5-212 (Senate Bill 455), adopted by the Georgia General Assembly in 2006, "Each telecommunications company shall provide annually to the office of the Attorney General certification that it has established operating procedures for security of telephone records that are adequate to ensure compliance with 47 U.S.C. Section 222 and any rules promulgated thereunder."

Therefore, attached is a copy of the certification executed by Hart Telephone Company certifying its compliance with 47 U.S.C. Section 222 for the year ending December 31, 2017.

Sincerely,

Randy Daniel
President, Hart Telephone Company

HART TELEPHONE COMPANY, INC.
P. O. Box 388 Hartwell, GA 30643 706-376-4701

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date signed: January 2, 2018

Names of Companies Covered by this Certification:

499 Filer ID

Hart Telephone Company, Inc.

809132

Hart Communications, Inc.

826541

Name of signatory: Randy Daniel

Title of signatory: President

I, Randy Daniel, certify that I am an officer of the affiliated companies named above (collectively and individually "Company", 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 CPNI rules of the Federal Communications Commission ("Commission"). *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 did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2017. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company did not receive any customer complaints in 2017 concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.



Attachment

HART TELEPHONE COMPANY

Hart Telephone Company, Inc. 499 Filer ID 809132
Hart Communications 499 Filer ID 826541

P. O. Box 388 Hartwell, GA 30643 706-376-4701

2017 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE **January 2, 2018**

This statement accompanies the Company's 2017 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.20101(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following 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:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.