

Manchester-Hartland Telephone Company

204 Railroad St. Manchester, MN 56007 (507)826-3212 Fax: (507) 826-3678

Annual 47 C.F.R. § 64.2009(e) CPNI Certification **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: January 17, 2019
2. Name of company(s) covered by this certification: Manchester-Hartland
Telephone Company
3. Form 499 Filer ID: 803733
4. Name of signatory: Cory Hoerler
5. Title of signatory: Operations Manager
6. Certification:

I, Cory Hoerler, 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 CPNI rules. 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 (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 any 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 any 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  Cory Hoerler, Operations Manager

Attachments: Accompanying Statement explaining CPNI procedures

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The operating procedures of Manchester-Hartland Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Manchester-Hartland Telephone Company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Manchester-Hartland Telephone Company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees. In performing its duties under these rules, we provide all business office personnel with access to CPNI, a copy of this policy, and a written copy of the FCC Small Entity Compliance Guide – Telecommunications Carrier's Use of Customer Proprietary Network Information (CPNI) (June 6, 2008).

We train our employees as to when they are, and are not, authorized to use or disclose CPNI. Violation of the policy by company employees may result in any one or more the following: additional required training, warning, suspension with or without pay or termination of employment.

We authenticate the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

We disclose call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

We disclose CPNI to a customer in person at our business office only when the customer presents a valid photo ID and the ID matches the name on the account.

CPNI Recordkeeping and Reporting

Manchester-Hartland Telephone Company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Manchester-Hartland Telephone Company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Cory Hoerler, Operations Manager

1/17/2019

date