



**The Dunnell Telephone Company**

P O Box 728

Judson TX 75660

Office: (903) 663-0099

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January 25, 2018

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: 2017 Annual CPNI Certification and Accompanying  
Statement of Compliance EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 CFR Section 64.2009(e), Dunnell Telephone Company hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

*Charles D. Mattingly Jr.*

Charles D. Mattingly, Jr.  
President  
Dunnell Telephone Company

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EB Docket No. 06-36

## ANNUAL CERTIFICATION OF ANNUAL CPNI FILING FOR 2016

PURSUANT TO 47 CFR Section 64.2009(e)

NAME OF COMPANY: DUNNELL TELEPHONE COMPANY

FORM 499 FILER ID NO. 804624

DATE FILED: January 25, 2018

I, Charles D. Mattingly, certify that I am an officer of Dunnell Telephone Company (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 Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 CFR Section 65.2001 through Section 64.2011.

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 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 represents and warrants that the above certification is consistent with 47 CFR Section 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 US Code and may subject it to enforcement action.

*Charles D. Mattingly Jr.*  
Officer's Signature

Charles D. Mattingly  
Officer's Printed Name

President  
Officer Title



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

Dunnell Telephone Company (Company) operating procedures ensure that the Company 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 USC Section 222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 CFR Section 64.2001 through Section 64.2011.

The Company 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 quality, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of the Company 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 tolls 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 implemented safeguard procedures to protect our customers' CPNI from pretexters include, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 CFR Section 64.2010.

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