



285 Mid Century Lane · PO Box 380 · Fairview, IL 61432
1-888-231-4588 · www.midcentury.com

CPNI Version 1.0ACPS Dec-2007

Customer Proprietary Network Information (CPNI)

Statement of CPNI Compliance

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

EB Docket 06-36

Annual Certification Processes Summary Certification for 2019 covering the prior calendar year 2018

The Statements below describe the operating procedures and actions taken to ensure that CEI is in compliance with the FCC's CPNI Rules.

A. Employee CPNI Training	<p>Century Enterprises, Inc. (CEI) is Mid Century Telephone Cooperative's (MCTC) subsidiary long distance company; as such, CEI has no employees. CEI does have a CPNI Policies and Procedures Manual. Any CEI long distance CPNI related training is conducted in conjunction with Mid Century's CPNI training. Employee training is documented and properly retained.</p> <p>CEI is Mid Century Telephone Cooperative's subsidiary long distance company; as such, CEI has no employees. Employees are guided by the Cooperative's Employee Handbook policies and principles. CPNI employee related infractions will be reported to the CEO and disciplinary steps will be taken, up to and including discharge if applicable. A record will be made of the infraction along with any subsequent discipline and placed in the employee's personnel file.</p> <p>There were no MCTC CPNI employee infractions for year 2018.</p>
B. Disciplinary - Improper Disclosure of CPNI	
C. Process for Opt-in and Opt-out	<p>CEI markets to its customers using the Opt-out approach, when applicable. CEI does not participate in 3rd party marketing and therefore Opt-in has not been utilized. MCTC is responsible for complying with CPNI Opt-out rules on behalf of its affiliates and as established by its CPNI policies.</p> <p>Mid Century will honor any customer CPNI election it receives by recording the restriction or non-restriction to the company and to its affiliate companies, including CEI, customer account records. On its own behalf, CEI will also mail Opt-out notification documents to customers when it runs certain sales or marketing campaigns. There were no applicable sales or marketing campaigns for year 2018.</p> <p>Occasionally, a CEI (MCTC) representative may ask the customer for oral consent to use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone</p>

C. Process for Opt-in and Opt-out-cont.	services to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services. Detailed comments will be noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.
D. Actions taken against data brokers (Pretexters)	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2018.
E. Pretexters process(es) - attempt to access CPNI	No known access to CPNI by Pretexters (breaches) was reported for the year 2018.
F. Customer Complaints - Unauthorized release of CPNI	No customer complaints were received as a result of unauthorized release of CPNI for 2018.
G. Process to ensure Opt-out elections are recorded & followed	Customers may call MCTC's business office or its after-hours support, come to our business office, e-mail us, respond to our annual Opt-out customer notification, or utilize the Opt-out form on our website in order to deny or approve our use of the customer's CPNI to offer products or services not related to the communications services to which the customer currently subscribes. Service order processing and Customer Service Representative procedures are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or un-restrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.
H. Other CPNI Compliance measures	<p>Access to customer CPNI is limited to authorized personnel and restriction pass codes (PINs) are used to facilitate safeguard assurance. Release of call detail information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis. CEI treats all customer information as confidential as a matter of company policy or procedure, regardless if not covered under the CPNI rules. Cybersecurity best practices are in place and used to secure computers and telecommunications networks.</p> <p>Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.</p>

Form 499 Filer ID: 808474

Signed: 
James W. Broemmer/CEO

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