MCTC
MID CENTURY TELEPHONE COOPERATIVE™
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Customer Proprietary Network Information (CPNI)
Statement of CPNI Compliance
Annual 47 C.F.R. §64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual Certification Processes Summary
Certification for 2017 covering the prior calendar year 2016

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

A. Employee CPNI Training	Mid Century Telephone Cooperative (MCTC) continues to be proactive in ensuring its employees are properly updated and trained in procedures related to CPNI. Employees are trained annually, at a minimum. Employee training is documented and properly retained. Training includes, but is not limited to; defining CPNI, authenticating a customer, establishing a secured customer account pass code, explaining Opt-out procedures, and circumstances when customer notification is necessary, how CPNI affects sales and marketing, protecting customer accounts, and providing examples of when employees are and are not authorized to use CPNI. CPNI protection also extends into Mid Century's Privacy Policy and Red Flag Identity Theft Prevention Program.
B. Disciplinary – Improper Disclosure of CPNI	MCTC's CPNI policy includes an express disciplinary process for employee infractions. There were no CPNI employee infractions for 2016.
***C. Process for Opt-in and Opt-out**	MCTC markets to its customers using the Opt-out approach, when applicable. MCTC does not participate in 3rd party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, MCTC notifies its customers every two years of a customer's Opt-out rights and methods to Opt-out. Mid Century complied with this customer Opt-out notification in October 2015. There were no applicable sales or marketing campaigns requiring prior Opt-out notification for year 2016. Occasionally and with management approval, a MCTC or Century Enterprises, Inc. (CEI) - MCTC's long distance subsidiary - 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 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 are noted to customer accounts 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 2016.
E. Pretexters process(es) – attempt to access CPNI	No known access to CPNI by Pretexters (breaches) was reported for the year 2016.
F. Customer Complaints – Unauthorized release of CPNI	No customer complaints were received as a result of unauthorized release of CPNI for the year 2016.
G. Process to ensure Opt-out elections are recorded & followed	Customers may call our business office or our after-hours support, come in to one of our business office locations, e-mail us, respond to our biennial Opt-out customer notification, or utilize the Opt-out form on our website in order to deny or approve our use of their CPNI to offer products or services not related to the telephone 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. An Opt-out alert is applied to a customer account when an Opt-out election form is received. Follow-up verification of Opt-out restrict or un-restrict may only be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure customer's Opt-out preference reflects current elections. Record of Opt-out approval or disapproval is retained for a minimum of 3 years.
H. Other CPNI Compliance measures	Access to customer CPNI is limited to authorized personnel. Restriction pass codes are used to facilitate safeguard assurance. The customer pass code is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis. MCT 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.

***Mid Century will honor any customer CPNI elections it receives by recording the restriction or non-restriction to the company and to its affiliate companies, Century Enterprises, Inc. and CenComm, Inc., customer account record.**

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Signed By: _____

James W. Broemmer / CEO