

Annual 47 C.F.R. § 64.2009 CPNI Certification Template

EB Docket 06-36

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

1. **Date filed:** January 30, 2019
2. **Name of company(s) covered by this certification:** Home Telephone Company, Inc. and Home Communications, Inc.
3. **Form 499 Filer ID:** 809018, 827060
4. **Name of signatory:** Richard Baldwin
5. **Date Title of signatory:** CEO
6. **Certification:**


I, Richard Baldwin, 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 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 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 
Richard Baldwin, Chief Executive Officer
Home Telephone Company, Inc.
Home Communications, Inc.

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers
Summary of customer complaints

Statement Concerning Procedures Ensuring Compliance with CPNI Rules
Explanation of Any Actions Data Brokers, and
Summary of all Customer Complaints Received

Richard Baldwin signs this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222 and 47 CFR 64.2009, on behalf of Home Telephone Company, Inc. and Home Communications, Inc. (Company), related to the previous calendar year, 2017.

This Certificate of Compliance addresses the requirement of 47 CFR 64.2009 that the Company provide:

- A “statement accompanying the certificate” to explain how its operating procedures ensure compliance with 47 CFR, Part 64, Subpart U;
- An 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 customer proprietary network information (CPNI)

On Behalf of the Company, I Certify as Follows:

1. I am the Chief Executive Officer of the Company, and therefore an officer of the Company. My business address is 211 S. Main, Galva, Kansas 67443.
2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communication Commission’s rules relating to CPNI.
3. The operating procedures of Home Telephone Company, Inc. (Form 499 Filer ID No. 809018) and Home Communications, Inc. (Form 499 Filer ID No. 827060) (the “Company”) ensure that the Company complies with Part 64, Section 2001 *et. seq.* of the FCC rules governing the use of Customer Proprietary Network Information (“CPNI”).
4. The Company has established a system by which the status of a customer’s approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management team to ensure that no use of CPNI is made without review of applicable rules and law.
5. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

6. The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.
7. The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.
8. The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.
9. The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.
10. The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.

Explanation of Actions Against Data Brokers

11. The Company has not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

Summary of all Customer Complaints Received

12. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.
13. The Company has no knowledge of any attempt by pre-texters to access its Customer's CPNI.

The Company represents and warrants that this certification is consistent with 47 CFR 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.



Richard Baldwin
Chief Executive Officer

1-30-19

Date