



February 1, 2019

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Suite TW-A325  
Washington, DC 20554

**RE: Annual CPNI Certification for 2018  
EB-Docket No. 06-36**

Dear Ms. Dortch:

In accordance with the Public Notice, DA 06-223, issued by the Enforcement Bureau on January 30, 2006, Mark Twain Long Distance, Inc. hereby files its most recent certification regarding its compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. Part 64, Subpart U.

If you have any questions, please feel free to contact me at 660-423-5211.

Sincerely,

Jim Lyon  
Compliance Officer

cc: Best Copy and Printing, Inc. – via e-mail at [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 1, 2019

Name of company covered by this certification: Mark Twain Long Distance, Inc.

Form 499 Filer ID: 803690

Name of signatory: Jim Lyon

Title of signatory: Compliance Officer

I, Jim Lyon, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

Mark Twain Long Distance, Inc. ("Mark Twain") does not use CPNI for marketing purposes. Accordingly, Mark Twain's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Mark Twain has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.

Mark Twain has not taken any actions against data brokers in the past year regarding any breach of CPNI information.

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 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.

  
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Jim Lyon  
Compliance Officer

Mark Twain Long Distance, Inc.  
48054 State Highway 6  
Hurdland, Missouri 63547

**Accompanying Statement**

Mark Twain Long Distance, Inc. ("Company") maintains the following operating procedures to ensure compliance with the rules set forth in 47 C.F.R. Part 64, Subpart U:

**A. CPNI Approval and Use**

The Company does not currently solicit "opt out" or "opt in" customer approval for the use or disclosure of CPNI. The Company does not use CPNI for marketing purposes and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

**B. CPNI Training, Marketing Campaigns, and Supervisory Review**

The Company has established CPNI compliance policies that include employee training on restrictions on the use and disclosure of CPNI and required safeguards to protect against unauthorized use or disclosure of CPNI. Employees understand the CPNI policies and a violation of those policies will result in disciplinary action.

The Company's CPNI policies require employees to obtain approval from the Company's CPNI Compliance Officer for all marketing campaigns prior to initiating that campaign. Record of all sales and marketing campaigns, along with the appropriate supervisory approval is maintained for at least one year.

The Company's CPNI policies and employee training include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.

**C. Customer Access to CPNI**

The Company's CPNI policies ensure that a customer is only able to access call detail information over the telephone in one of the ways listed in Rule 64.2010(b). If the customer cannot remember their password, they are prompted to answer a security question. Neither the password nor the security question are based on readily available biographical information or account information. Customer service representatives are instructed to authenticate customers over the telephone in all instances except in the case where the customer provides the call detail information without the assistance of the Company.

The Company's CPNI policies require customer authentication without the use of readily available biographical information or account information prior to initially gaining access to an account online. Once the customer is authenticated the customer is required to use a password to obtain online access to CPNI. The Company's CPNI policies allow the Company to disclose call detail CPNI to the customer at a retail location after presenting a valid photo ID that matches the customer's account information.

The Company's CPNI policies allow for a few ways to establish a password, all of which ensure compliance with the above paragraph. Each method also allows the customer to establish a back-up or security question in the event that they forget their password. In no event does the Company use readily available biographical information or account information as a back-up question or as a means to establish a password or authenticate the customer.

The Company's billing system generates a notification letter when any of the fields listed in Rule 64.2010(f) is created or changed. The Company immediately mails out the notification to the address of record (never a new address) when required by Rule 64.2010(f). The content of the notification complies with the requirements of Rule 64.2010(f).

The Company does not utilize the business customer exception at this time.

#### **D. Law Enforcement Notification**

The Company has policies and procedures in place to ensure compliance with Rule 64.2011. When it is reasonably determined that a breach has occurred, the CPNI Compliance Officer will notify law enforcement and its customer in the required timeframes. A record of the breach will be maintained for a minimum of two years and will include all information required by Rule 64.2011.