

WILKERSON ♦ BRYAN

WILKERSON & BRYAN, P.C.
ATTORNEYS & COUNSELORS

405 SOUTH HULL STREET
MONTGOMERY, ALABAMA 36104
TEL. 334.265.1500

MAILING ADDRESS
POST OFFICE BOX 830
36101-0830
FAX 334.265.0319

MARK D. WILKERSON

mark@wilkersonbryan.com

February 1, 2019

Via Electronic Comment Filing System

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: Castleberry Telephone Co., Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer
Proprietary Network Information (CPNI) Compliance Certification for
Calendar Year 2018
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Castleberry Telephone Co., Inc. ("Castleberry"), please find attached the annual CPNI Compliance Certification for Castleberry for the year 2018 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Mark D. Wilkerson

Enclosure

cc: Homer Holland

**Before the
Federal Communications Commission
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT
OF
CASTLEBERRY TELEPHONE CO., INC.**

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Castleberry Telephone Co., Inc. (hereinafter, "Castleberry") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Castleberry:

1. I have personal knowledge that Castleberry has implemented a system by which the status of a Customer's Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Castleberry obtains written approval for the use of its customers' CPNI and that Castleberry has notified its customers of their right to restrict Castleberry's use of, disclosure of and access to their CPNI prior to obtaining such written approval. Each customer's record contains a designation identifying whether or not Castleberry has obtained, through the processes permitted by the Federal Communications Commission's ("FCC") rules, the customer's approval to use, disclose or permit access to his or her CPNI.
3. I have personal knowledge that Castleberry has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Castleberry trains, at least once annually, its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Castleberry has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Castleberry has implemented procedures to safeguard the disclosure of its customers' CPNI, including the following: procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts, online access or business office visits; a customer password and backup authentication system; notification of customer account changes; and notification of security breaches of customer CPNI to law enforcement agencies. In particular, Castleberry discloses call detail information ("CDI") in a customer-initiated call only after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record. Castleberry discloses CPNI to a customer in person at its retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

5. I have personal knowledge that Castleberry maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Castleberry retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Castleberry has established a supervisory review process regarding its compliance with the FCC's rules for outbound marketing situations and that Castleberry maintains records of such compliance for a minimum period of one (1) year. Castleberry's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Castleberry will maintain records of any discovered breaches, notices to law enforcement, and their responses, for at least two (2) years.

8. I have personal knowledge that Castleberry has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Castleberry, I represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Castleberry to enforcement action.

Executed on this 1st day of February, 2019.

CASTLEBERRY TELEPHONE CO., INC.

By: Homer Holland

Printed: Homer Holland
As Its: Secretary/Treasurer

CASTLEBERRY TELEPHONE CO., INC.

P.O. BOX 37
CASTLEBERRY, ALABAMA 36432
PHONE 966-2110

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

EB Docket 06-36

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

Date filed: February 1st, 2019

Name of company covered by this certification: Castleberry Telephone Co., Inc.

Form 499 Filer ID: 805914

Name of signatory: Homer Holland

Title of signatory: Secretary/Treasurer

In response to the Federal Communications Commission's ("Commission") rules and policies, Castleberry Telephone Co., Inc. (the "Company") states as follows:

I, Homer Holland, 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 Customer Proprietary Network Information ("CPNI") rules, as set forth in 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, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The Company has not taken any 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 any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure 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 Homer Holland