

Accompanying Statement
To 2017 CPNI Annual Certificate
Spruce Knob Seneca Rocks Telephone, Inc.

Spruce Knob Seneca Rocks Telephone, Inc. (“SKSRT”) adheres to all CPNI rules found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations (Sections 64.2001 – 64.2011) concerning the proper use of our customers’ CPNI.

SKSRT has established procedures requiring company personnel to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Employees must properly authenticate a customer prior to disclosing CPNI.

SKSRT has implemented a detailed Policies and Procedures Manual on the use, and safeguarding, of CPNI. The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and signed by all company employees. In addition, all current SKSRT employees have been thoroughly trained on the use, and safeguarding, of CPNI and all new employees receive similar training upon hire.

SKSRT uses CPNI for marketing purposes and our customer notices for use of CPNI approval meets all of the requirements contained in the FCC rules, including those specified in Section 64.2008.

To further protect our customer’s privacy, we have implemented all of the safeguards contained in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates’ sales and marketing campaigns that use customer CPNI;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of SKSR Telecom’s policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms do not work properly, to such a degree that consumers’ inability to opt-out is more than an anomaly.

Signed Ivan “Sonny” O’Neil