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MARK D. WILKERSON

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February 4, 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: Ragland Telephone Company, Inc.'s and Ragland Long Distance Company, 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 Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (collectively, "Ragland"), please find attached the annual CPNI Compliance Certification for Ragland 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: Tim Ford

MATTHEW JACKSON
PRESIDENT

TIM FORD
SECRETARY



STEPHANIE JACKSON
VICE PRESIDENT

DOYLE KAY
PLANT SUPERVISOR

Ragland Telephone Co., Inc.

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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 4, 2019

Name of company covered by this certification: Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc.

Form 499 Filer ID: 804558

Name of signatory: Matthew Jackson

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") rules and policies, Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (the "Companies") state as follows:

I, Matthew Jackson, certify that I am an officer of the Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have 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 Companies' procedures ensure that the Companies are 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 Companies have 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 Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The Companies 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. The Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.

Signed

A handwritten signature in blue ink, appearing to be "Raf", written over a horizontal line.

MATTHEW JACKSON
PRESIDENT

TIM FORD
SECRETARY



STEPHANIE JACKSON
VICE PRESIDENT

DOYLE KAY
PLANT SUPERVISOR

Ragland Telephone Co., Inc.

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

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF RAGLAND TELEPHONE COMPANY, INC. AND RAGLAND LONG DISTANCE COMPANY, 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 Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (hereinafter, collectively "Ragland") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Ragland:

1. I have personal knowledge that Ragland 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 Ragland obtains written approval for the use of its customers' CPNI and that Ragland has notified its customers of their right to restrict Ragland'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 Ragland 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 Ragland has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Ragland 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 Ragland has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Ragland 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, Ragland 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. Ragland 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 Ragland 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. Ragland retains all such records for a minimum period of one (1) year.

6. I have personal knowledge that Ragland has established a supervisory review process regarding its compliance with the FCC's rules for outbound marketing situations and that Ragland maintains records of such compliance for a minimum period of one (1) year. Ragland'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 Ragland 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 Ragland has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Ragland, 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 Ragland to enforcement action.

Executed on this the 4 day of February, 2019.

RAGLAND TELEPHONE COMPANY, INC.
RAGLAND LONG DISTANCE COMPANY, INC.

By: 

Printed: Matthew Jackson
As Its: President