

Hinton Telephone Company, Inc.
P.O. Box 1040, Hinton, OK 73047
405-542-3262

Date 2-5-2019

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

Re: 2018 Annual CPNI Certification and Accompanying Statement of Hinton Telephone Co., Inc. EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), Hinton Telephone Co., Inc. hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission please contact the undersigned.

Sincerely, Jason Doughty
Jason Doughty

cc: Best Copy and Printing, Inc.

EB Docket No. 06-36

ANNUAL CERTIFICATION OF CPNI FILING FOR 2017

PURSUANT TO 47 C.F.R. §64.2009(e)

Name of Company: Hinton Telephone Company

Form 499 Filer ID No. 804126

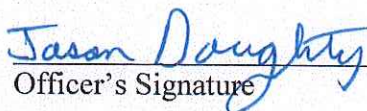
Date Filed: February 5th, 2019

I Jason Doughty certify that I am an officer of Hinton Telephone Company; 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 Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

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 any action against data brokers during the preceding year regarding unauthorized release of CPNI; nor has the Company received any customer complaints concerning the unauthorized access to or unauthorized 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.



Officer's Signature

Jason Doughty
Officer's Printed Name

Secretary / Treasurer
Officer Title

**STATEMENT OF COMPLIANCE WITH THE
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

Hinton Telephone's (the "Company") operating procedures ensure that the Company is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of the Company that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has implemented safeguard procedures to protect our customers' CPNI from pretexters including, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 C.F.R. §64.2010.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

HINTON TELEPHONE COMPANY
CUSTOMER PROPRIETARY NETWORK INFORMATION
POLICIES AND PROCEDURES

I. PURPOSE

To establish the Company's policy and ensure employee compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009

II. SCOPE

This policy applies to all employees.

III. DEFINITION

Customer Proprietary Network Information (CPNI) is defined as information that relates to the quantity, technical configuration, type, destination, location and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and information contained in the bills pertaining to telephone exchange service, wireless service or toll service received by a customer of a carrier; except that such term does not include subscriber list information. This includes personal information such as the phone numbers called by the consumer, the length of the phone calls, and service purchased by the consumer such as call waiting.

IV. INFORMATION NOT COVERED

- A. CPNI does NOT include published directory information, i.e. subscriber list information such as a customer's name, address and telephone number, as well as any information that is available in the public domain or from any other, non-company source.
- B. Customer Premises Equipment (CPE) and information services are not considered a telecommunications service under CPNI rules.
- C. Since customer information derived from sales of CPE is not considered CPNI, this information may be used to market CPE and information services to customers in conjunction with bundled offerings that may include telecommunications service.
- D. CPNI regulations may apply to the use of the information covered in paragraph C. above for marketing functions.

V. POLICY

A. Permitted Use - We can obtain, disclose and use CPNI without customer approval:

1. To initiate, render, bill and collect for telecommunications services;
2. To protect the rights or property of the carrier;
3. To protect users of those services and other carriers from unlawful, abusive or fraudulent use of or subscription to these services;
4. To provide any marketing of services in response to an inbound call from the customer;
5. To provision inside wiring installation, maintenance and repair services;
6. To provide call location information for the assistance in the delivery of emergency services;
7. As required by law such as in response to a validly issued subpoena;
8. Reporting violations relating to child pornography as set forth in 42 U.S.C. §13032.

Other than the above exceptions CPNI may not be used without customer notification and approval as set forth below.

B. Customer Notice - The FCC has adopted both an Opt-in method and an Opt-out method for obtaining customer approval to use CPNI. Applicants for service will be provided with a copy of any applicable Notices as a part of their service installation.

1. Form of Notice - Both types of notices must state the customer has a right, and the carrier a duty, under federal law, to protect CPNI. The notice must state what information constitutes CPNI; describe how it will be used, and the customer's right to disapprove the use of CPNI. Notice must be clear and understandable.

2. Opt-In Notice - This method is required for disclosure of CPNI to unrelated third-parties or to affiliated carriers that do not provide communications-related services. This requires the carrier obtain the customer's express, affirmative consent allowing the use and release of CPNI. The FCC allows written, electronic, and oral notice to customers when soliciting opt-in approval; and notice only needs to be given once. (Note: This does not apply to subscriber listing information given to other carriers for telephone directories).

3 Opt-Out Notice- This method is required for disclosure of CPNI to affiliated entities providing communications-related services, as well as third party agents and joint venture partners providing communications related services. Under this method, the customer is deemed to have consented to the use, disclosure or access to the customer's CPNI if the customer has failed to object thereto within a minimum of 30 days from receiving notice. If soliciting Opt-Out approval, customers must be given individual notice; and notice must be mailed once every two years.

- C. Employee Responsibility - All Company employees need to understand what is or is not CPNI and when they can or cannot access or use customers CPNI. Always check before providing information to an affiliated company to be certain the customer has not denied us authority to do so.
- D. Sales and Marketing Campaigns - In compliance with Title 47 Section 64.2009 of the Code of Federal Regulations, the Company has established procedures for maintaining a record of the use of CPNI between the Company and any of its affiliates. Records of the use of CPNI will be maintained for a minimum of the statutory requirement.
- E. Third Parties - Company will not disclose CPNI to any third parties unless the customer authorizes the release of their information.
- F. Compliance Officer - Jason Doughty is Hinton Telephone Company's Compliance Officer and must certify on an annual basis that the FCC's CPNI rules are being followed.
- G. Customer Requests for CPNI - In compliance with the FCC's CPNI rules, the Company has adopted a policy for customer requests for CPNI. When customers call the Company requesting call detail or call records, CPNI is not released over the phone absent the customer providing us their password. If they do not provide a password, or do not want to create a password, we either send it to the address of record, or call the telephone number of record and give them the information. This requirement does not extend to non-call detail CPNI information the customer may request, or carrier-customer relations such as billing questions etc. Customers that request CPNI in our offices must produce a valid photo ID and they must be on the account. Password protection is in place for any online account information requests.
- H. Customer Notice of Account Changes - The Company is required to notify customers immediately when the following are created or changed: (1) a password; (2) a back-up for forgotten passwords; (3) an online account; or (4) the address of record. Notification may be made through voice-mail or text messaging to the telephone number of record or by mail the address of record.

- I. Notice of Unauthorized Disclosure of CPNI. If a customer's CPNI has been disclosed to a third party absent the customer's consent, the Company has procedures in place to notify law enforcement first prior to notifying the customer so law enforcement can investigate any criminal activity.

VI. NONCOMPLIANCE

Employees found to be in violation of this CPNI policy will be subject to standard disciplinary procedures.

Jason Doughty
Compliance Officer

2-5-2019
Date