



February 7, 2019

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

Dear Ms. Dortch:

In response to FCC Public Notice DA 08-171 dated January 29, 2008, Dalton Utilities (which provides local telephone service to the Dalton, Georgia service area (CLEC License No. L-0166) is submitting this Compliance Certificate:

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 7, 2019

Name of company covered by this certification: Board of Water, Light, & Sinking Fund
Commissioners dba Dalton Utilities

Form 499 Filer ID: 823290

Name of signatory: Hank Blackwood

Title of signatory: Chief Technical Services Officer

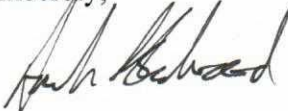
I, Hank Blackwood, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et 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.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized access to CPNI.

Sincerely,

A handwritten signature in black ink, appearing to read "Hank Blackwood". The signature is fluid and cursive, with the first name "Hank" being more prominent.

Hank Blackwood
Chief Technical Services Officer

Attachment: (1)

CHAPTER 2 – CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

2.1 Scope

To insure the protection of the privacy of our customers by prohibiting the external or internal sale of telephone call records.

2.2 Procedure

2.2.1 Upon receipt of request for customer call records:

- a. Notify Compliance Officer of request for call records.
- b. Compliance Officer to log request with approved/denied status.
- c. Only requests followed by legal court order shall be approved.
- d. Failure to follow procedure shall result in disciplinary action as referenced in the Personnel Policies and Procedures Manual, Chapter 14 Section 14.3.1.

2.3 Training

2.3.1 All Customer Service, Sales, and Marketing employees to receive annual training.

2.4 Record Keeping

2.4.1 Record of requests shall be maintained for a minimum of one year

2.4.2 Compliance Officer to provide a compliance certificate on an annual basis to FCC.