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February 8, 2018

VIA ECFS

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

RE: EB Docket No. 06-36
Section 64.2009(e) CPNI Certification
Alma Communications Company d/b/a Alma Telephone Company
Form 499 Filer ID No: 804645

Dear Ms. Dortch:

Pursuant to 47 CFR §64. 2009(e), Alma Telephone Company hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Tommie Sue Loges".

Tommie Sue Loges
Administrative Assistant/Office Manager

Tsl
Attachments

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior year 2017

Date Filed: February 8, 2018

Name of company covered by this certification: Alma Communications Company d/b/a
Alma Telephone Company

Form 499 Filer ID: 804645

Name of signatory: Adolf L. Heins

Title of signatory: Vice-President

I, Adolf L. Heins, 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 CFR § 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 (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken 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 customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR §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



Attachments:

Accompanying Statement explaining CPNI procedures

ALMA COMMUNICATIONS COMPANY d/b/a
ALMA TELEPHONE COMPANY
ACCOMPANYING STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER
PROPRIETARY NETWORK INFORMATION (CPNI) RULES
For the Year Ending 2017
Form 499 Filer ID: 804645

Alma Telephone Company's (the "Company") operating procedures ensure that the Company is in compliance with the FCC's CPNI Rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations; 47 CFR § 64.2001 through § 64.2011.

The Company adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. The Company has implemented procedures to protect our customers' CPNI from pretexters including the adoption and implementation of a policy for customer requests for CPNI consistent with the Commission Rules. To further protect our customer's privacy, the Company has implemented all safeguards required 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 Company implements training on CPNI with all employees. The training includes, but is not limited to the instruction 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.
- The Company has and maintains copies of the FCC's CPNI Rules in addition to its own CPNI Manual. The Company CPNI Manual is fully compliant with the FCC CPNI rules and must be reviewed and acknowledged annually by all Company employees.
- The Company employees having access to CPNI information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate consent or as allowed by law and the FCC rules. Any employee that discloses CPNI in violation of the FCC rules is subject to disciplinary action, and possible termination.
- The Company has an established supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; including the maintenance of record retention of at least one year, of our own, and our affiliates' sales and marketing campaigns.
- The Company has established procedures for notification of the Commission within 5 business days 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.