



February 8, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20035

Re: Certification of CPNI Filing, due March 1, 2019
EB Docket 06-36

Dear Ms. Dortch:

Columbine Telephone Company, Inc. hereby submits its annual compliance certification for the year ending December 31, 2018, pursuant to Section 64.2009(e) of the Commission's Rules. Included is a statement of how Columbine's operating procedures ensure compliance with the Rules, an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Please direct any questions about this filing to me at 307-883-6011 by email at bjackson@silverstar.net.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Bonnie Jackson', is written over a faint, larger version of the same signature.

Bonnie Jackson
Legal & Regulatory Assistant

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 8, 2019

Name of company(s) covered by this certification: Columbine Telephone Company, Inc.

Form 499 Filer ID: 804096

Name of signatory: Jefferson H. England

Title of signatory: Chief Financial Officer

I, Jefferson H. England, 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 (i.e., proceedings instituted or petitions filed either state commissions, the court system, or at the Commission against data brokers).

The company has received no customer complaints in the past year concerning the unauthorized release of CPNI.

Signed


Jefferson H. England

Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Columbine Telephone Company, Inc. (the "Company") ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.