

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

**Re: EB Docket No. 06-36**

Annual Section 64-2009(e) CPNI Certification  
Moundridge Telcom, Inc. (499 Filer ID: 820429)

Dear Ms. Dortch:

On behalf of Moundridge Telcom, Inc. ("Moundridge Tel") and pursuant to 47 C.F.R. Section 64.2009(e) of the Commission's rules, I am attaching Moundridge Tel's Annual CPNI Certification for 2019 (*covering the prior calendar year 2018*) and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

**Tom Karalis**  
Senior Associate / Partner  
FWA, Inc.

**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**

- 1. Date filed:** 2/8/2019
- 2. Name of company covered by this certification:** Moundridge Telcom, Inc.
- 3. Form 499 Filer ID:** 820429
- 4. Name of signatory:** Harry Wheelborg
- 5. Title of signatory:** President
- 6. Certification:**

I, Harry Wheelborg, 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.*

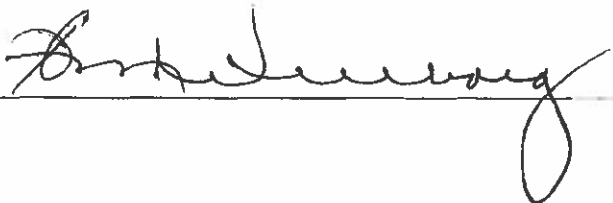
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

**Moundridge Telcom, Inc. *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.**

**Moundridge Telcom, Inc. *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. 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.

Signed: \_\_\_\_\_

**Print Name:** Harry Weelborg

**Title:** President  
Moundridge Telcom, Inc.

**Date:** 1-31-19

**Statement of Compliance with the FCC's  
Customer Proprietary Network Information "CPNI"  
Rules and Regulations**

Moundridge Telcom, Inc.'s ("Moundridge Tel") operating procedures certify that Moundridge Tel is in compliance with the FCC's rules and regulations regarding Customer Proprietary Network Information (CPNI).

All of Moundridge Tel's employees are aware that disclosure of our customers' CPNI information without obtaining the proper customer approval is a violation of the FCC's rules 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 64.2009.

Moundridge Tel has taken the steps and has internal procedures in place so as to educate its employees through training regarding the FCC's rules and regulations as to when and where CPNI information may be released. The employees that have access to this information are aware that the FCC prohibits the disclosure of such information without the proper customer consent and as allowed by law and the FCC's rules.

- Any employee that violates Moundridge Tel's CPNI operating procedures is subject to disciplinary action, up to dismissal.
- Moundridge Tel mandates yearly CPNI training for all employees to ensure up to date compliance with any new regulations.
- Moundridge Tel has implemented safeguards for our customers' protection against pretexters consistent with the FCC's requirements in Section 47 C.F.R. 64.2010.

**Certification of CPNI Filing**

**EB-06-TC-060**

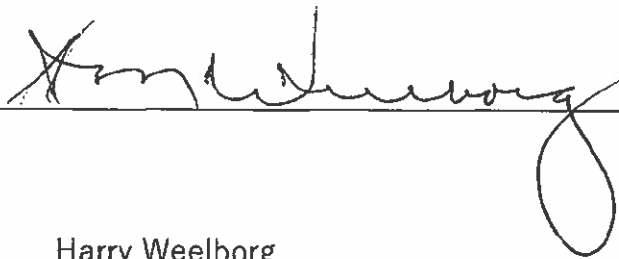
**EB Docket No. 06-36**

**ANNUAL CERTIFICATION**  
**Customer Proprietary Network Information Procedures of**  
**Moundridge Telcom, Inc.**

I, Harry Weelborg, as an Officer of the company named above do hereby certify that I have personal knowledge that Moundridge Telcom, Inc. ("Moundridge Tel") has established procedures regarding the Customer Proprietary Network Information related to the subscribers of Moundridge Tel.

These procedures, described on the attached page, are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR § § 64.2001-64.2009.

Signed: \_\_\_\_\_



By: Harry Weelborg  
President  
Moundridge Telcom, Inc.

Date: 1-31-19

## **Certification of CPNI Filing**

### **Moundridge Telcom, Inc.**

**Moundridge Telcom, Inc.** ("Moundridge Tel" or "Company") hereby submits that its procedures regarding its subscribers' Customer Proprietary Network Information ("CPNI") are in compliance with Section 222 of the Communications Act of 1934, as amended (47 U.S.C. 222) and 47 CFR § § 64.2001-64.2009.

Moundridge Tel certifies that it protects and utilizes its customers' CPNI in compliance with the Commission's rules in 47 CFR § § 64.2001-64.2009 and does not sell or disclose subscriber CPNI to outside entities.

### **Moundridge Telcom, Inc. Company Waiver**

All employees have signed a company waiver stating that they have received annual CPNI training and are aware of the FCC's CPNI regulations as well as the related federal regulations and Moundridge Tel's statutory responsibility to its customers. All requests for subscriber CPNI are forwarded to Senior Management personnel and any unauthorized use, sale, or disclosure of CPNI by any employee would subject the employee to disciplinary action, up to and including dismissal.

### **Carrier Authentication Requirements**

Moundridge Tel prohibits its employees from releasing a customer's phone call records when a customer calls except when the customer provides a password. If a customer does not provide a password, Moundridge Tel will not release the customer's phone call records except by sending it to an address of record or by calling the customer at the telephone of record. Moundridge Tel also provides mandatory password protection for online account access. Moundridge Tel will provide all CPNI, including customer phone call records, to customers based on in-store contact with a valid government photo ID.

**Notice to Customer of Account Changes**

Moundridge Tel notifies the customer immediately when the following are created or changed: (1) a password; (2) a back-up for forgotten passwords; (3) the address of record, or (4) an online account.

**Joint Venture and Independent Contractor Use of CPNI**

Moundridge Tel requires explicit consent from a customer before disclosing their CPNI to a joint venture partner or independent contractors for the purposes of marketing communications-related services to that customer. In addition Moundridge Tel does not disclose nor allow access by others to subscribers' CPNI for the purpose of identifying customers placing calls to competing carriers.

**Business Customer Exemption**

Moundridge Tel may bind itself contractually to authentication regimes other than those described in this Section for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

**Notice of Unauthorized Disclosure of CPNI**

A notification process is established for both law enforcement and Moundridge Tel customers in the event of a CPNI breach. Moundridge Tel's Senior Management shall notify law enforcement of a breach of its customers' CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI). Moundridge Tel may notify the customer and/or disclose the breach publicly after seven business days following notification to the USSS and the FBI, if the USSS and the FBI have not requested to postpone the disclosure.

However, Moundridge Tel may immediately notify a customer or disclose the breach publicly after consultation with the relevant investigative agency, if Moundridge Tel believes that there is an extraordinarily urgent need to notify a customer or class of customers in order to avoid immediate and irreparable harm.

Additionally, Moundridge Tel will maintain a record of any discovered breaches, notifications to the USSS and the FBI regarding those breaches, as well as the USSS and the FBI response to the notifications for a period of at least two years. These records will include, if available, the date that Moundridge Tel discovered the breach, the date that Moundridge Tel notified the USSS and the FBI, a detailed description of the CPNI that was breached, and the circumstances of the breach.

#### **Opt-In / Opt-Out Approvals**

Moundridge Tel maintains records of all opt-in and opt-out approvals by customers, including a history of notices to customers. All outbound marketing campaigns are approved by the General Manager.

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