SELCO
SHREWSBURY ELECTRIC AND CABLE OPERATIONS
YOUR COMMUNITY PROVIDED ELECTRIC & CABLE SERVICES

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February 2, 2017

Via Federal Express

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

RE: CPNI Certification Compliance, EB Docket No. 06-36, for Shrewsbury Electric and Cable Operations

Dear Ms. Dortch:

Shrewsbury Electric and Cable Operations (SELCO), a municipally owned interconnected VoIP Service Provider serving the Town of Shrewsbury, Massachusetts, and pursuant to Section 64.2009(e) of the Commission's Rules, hereby submits its CPNI certification and accompanying statement.

Should you have any questions or require additional information, please contact the undersigned.

Sincerely,

Jackie Pratt
Marketing and Customer Care Manager

cc: Telecommunications Consumers Division, Enforcement Bureau

Attachment

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List ABCDE

100 Maple Avenue • Shrewsbury, MA 01545-5398 • Electric and Cable 508.841.8500 • Fax 508.842.9419

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017 covering the prior calendar year 2016.

1. Date filed: February 2, 2017

2. Name of company(s) covered by this certification: Shrewsbury Electric and Cable Operations (SELCO)

3. Form 499 Filer ID: 826045

4. Name of signatory: Michael R. Hale

5. Title of signatory: General Manager

6. Certification:

I, Michael R. Hale, 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.

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. 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 _____
Michael R. Hale

EXHIBIT A

CUSTOMER PROPRIETARY NETWORK INFORMATION RULES AND POLICIES

The following rules and policies describe Shrewsbury Electric and Cable Operation's operating procedures for maintaining a comprehensive customer proprietary network information ("CPNI") program to protect the privacy of our customers pursuant to Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and the FCC's rule 47 C.F.R. § 64.2009(e). These procedures prohibit the sale of telephone call records or the marketing use of such information. The use of customer data for external or internal sales initiatives is prohibited and a disciplinary process is in place to handle any violation of this policy.

"CPNI" is defined as "(A) 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 (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."

I. SCOPE

A. Prohibition on Use of CPNI in Marketing

To ensure the protection of the privacy of customer information by prohibiting the unauthorized release of CPNI and to prohibit the external or internal sale of telephone call records. Under no circumstances shall the customer databases associated with SELCO's telephone system be utilized for marketing activities.

B. Policies With Respect to Customer Access (protections against pretexting)

- SELCO shall not release CPNI to customers during customer-initiated telephone contact except when the customer provides a password.

  a) If a customer does not provide a password, SELCO may release call detail information by sending it to an address of record or,

  b) by calling the customer at the telephone of record.

- SELCO shall provide mandatory password protection for online account access.
- SELCO may provide CPNI to customers based on in-store contact with a valid photo ID.

- SELCO shall notify the customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

II. COMPLIANCE OFFICER

Jackie Pratt, SELCO Marketing and Customer Care Manager, has been appointed as the CPNI Compliance Officer, and can be reached at 508-841-8314 or jpratt@shrewsburyma.gov. All requests for CPNI data shall be referred to the CPNI Compliance Officer.

III. PROCEDURES

Upon receipt of a third-party request for customer call records or other CPNI data that is not initiated by the customer with verified password information:

- The employee receiving the request shall notify the Compliance Officer.
- The Compliance Officer shall log the request with approved/denied status.
- Only requests associated with a legal court order shall be approved/released. An accompanying letter must indicate that released information will not be used for marketing activities.
- Failure to follow the above procedure shall result in disciplinary action.

IV. REQUIREMENTS UPON DISCOVERY OF UNAUTHORIZED DISCLOSURE

The following process shall be followed upon discrovery that unauthorized disclosure of CPNI, in any form, has occurred.

- The Compliance Officer shall notify the FCCs Enforcement Bureau, Telecommunications Consumers Division by telephone within 24 hours of such discovery.
- The Compliance Officer shall notify the effected customers by telephone as soon possible, but no later than 24 hours after such discovery.
- The Compliance Officer shall notify local law enforcement within 24 hours of discovery of unauthorized access to CPNI.
- The Compliance Officer shall provide written notice to the FCC's Enforcement Bureau Telecommunications Consumers Division, 445 12th Street, S.W., Washington, D.C. 20554, no later than 7 days after such discovery.

V. TRAINING

All Customer Service, Sales, and Marketing employees shall receive CPNI training on annual basis.

VI. RECORD KEEPING

A written record of all requests for, and complaints regarding, CPNI shall be maintained for a minimum of one year. An Officer of SELCO shall provide a compliance certificate to the FCC by March 1 of each year documenting compliancy with this program and records of requests or complaints, as well as information with respect to proceedings against data brokers and pretexters.