



February 9, 2018

**FILED ELECTRONICALLY**

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

Re: EB Docket No 06-36  
Annual Section 64-2009(e) CPNI Certification  
Wabash Telephone Cooperative, Inc ( 499 Filer ID: 802440)

Dear Ms Dortch:

On Behalf of Wabash Telephone Cooperative, Inc ("Wabash") and pursuant to 47 C.F.R. Section 64.2009 (e) of the Commission's rules, I am attaching Wabash's Annual CPNI Certification and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Barry Adair". The signature is written in a cursive style.

Barry Adair  
General Manager/ EVP

BA/cg- encl.

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

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 9, 2018

Name of company(s) covered by this certification: Wabash Telephone Cooperative, Inc

Form 499 Filer ID: 802440

Name of signatory: Barry Adair

Title of signatory: Executive Vice President/ General Manager

Certification:

I, Barry Adair, 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 actions against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company

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  Barry Adair

**Attachment:** Accompanying Statement explaining CPNI procedures

CPNI Compliance Accompanying Statement:

Year: 2017

Wabash Telephone Cooperative, Inc.

This accompanying statement explains how Wabash Telephone Cooperative, Inc.'s operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U -Customer Proprietary Network Information- Part 64 of Title 47 of the Code of Federal Regulations.

Wabash Telephone Cooperative, Inc. adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have 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 training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of Wabash Telephone Cooperative, Inc.'s policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission 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.

Wabash Telephone Cooperative, Inc. has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.