

CERTIFICATE OF COMPLIANCE

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date filed: February 9, 2018

Name of company covered by this certification: Monmouth Telephone & Telegraph, Inc.

Form 499 Filer ID: 820770

Name of signatory: Mr. Kenneth Leland

Title of signatory: President

I, Kenneth Leland, certify that I am an officer of Monmouth Telephone & Telegraph, Inc. ("Monmouth" or "the Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the Commission's rules governing use and disclosure of confidential proprietary network information ("CPNI"), as governed by Section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, and as set forth in Part 64, Subpart U of the of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq.*

Monmouth has not received any customer complaints in the past calendar year concerning the unauthorized release of CPNI, and is not aware of any unauthorized disclosures of CPNI. The Company has not taken any actions against data brokers in the past year. Specifically, no proceedings have been instituted, nor have any petitions been filed by the Company at either state commissions, the court system, or at the Commission in the past year. The Company does not have any information with respect to the processes pretexters are using to attempt to access CPNI and what steps companies are taking to protect CPNI.



Kenneth Leland

President

Monmouth Telephone & Telegraph, Inc.

Executed: February 9, 2018

COMPLIANCE STATEMENT

The operating procedures of Monmouth Telephone & Telegraph, Inc. (“Monmouth” or “Company”) ensure that the Company complies with the FCC’s rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of CPNI. Monmouth ensures compliance with the FCC’s CPNI rules through the use of an internal policy limiting the use or disclosure of CPNI to very limited circumstances. The Company’s policy is administered by its President, Kenneth W. Leland, and includes the following governing principles:

- Monmouth does not use CPNI to market service offerings among the different categories of service, or even within the same category of service, that it provides to subscribers.
- Monmouth only serves enterprise, or business customers; it does not serve any residential customers. Monmouth ensures that its customers’ are served by a dedicated account representative as the primary contact, and that its customers’ contracts specifically address the Company’s protection of CPNI.
- Monmouth will not release or disclose CPNI to a third party, unless under exceptional circumstances. Specifically, Monmouth will only release or disclose CPNI to a third party pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority; or, pursuant to express customer approval. For example, customer information will only be disclosed after the requesting party demonstrates that the request is made pursuant to a valid subpoena, court order, search warrant or national security letter.
- Through the use of the FCC small entity compliance guide the Company trains employees to recognize CPNI and understand the limitations of use or disclosure set forth under federal law and Company policy.

- Monmouth maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties (pursuant to a valid request from law enforcement, the federal judiciary or other appropriate authority).
- Violations of this policy may result in disciplinary action, including the termination of employment where appropriate.



Kenneth Ireland

President

Monmouth Telephone & Telegraph, Inc.
Executed: February 9, 2018