1525 Dupont Rd.
Parkersburg, WV 26101
Phone: (304) 420-2470
Fax: (304) 420-2474

FCC
445 12th St SW
Washington, D.C. 20554

Re: CPNI Policies

CAS has in place a policy regarding the protection of the confidentiality of customer information provided to any employee, contractor, agent, affiliate or partner of CAS. CAS requires all employees or agents who have any contact with customers or customer information to agree to the policies set forth in our written CPNI policy. Signed employee agreements are kept on file at our main office once the employee or agent has been trained. Our CPNI policy includes the proper procedures for disclosing CPNI information to the owner of the telephone number as well as the recordkeeping requirements and terms. The policy also includes the notification methods for any unauthorized disclosure of CPNI to the appropriate person and procedures for supervisory review.

CAS, being a small cable company, does not sell any customer information to third parties, does not engage in any outbound telemarketing to customers for the purpose of upgrading to a higher level of service, and does not employ any retention or win-back efforts when a customer chooses to disconnect. Our largest concern with the CPNI was insuring that all customer information was given complete privacy. However, we did put in our policy information on all types of customer privacy issues to insure that our employees know the practices and procedures at all levels.

Please let me know if there is any further information that is required of our company.

I declare under penalty of perjury that the foregoing is true and correct.

Arthur Cooper

Arthur Cooper
President

Executed on 2/9/17

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

EB Docket 06-36

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

1. Date filed: **2/9/2017**
2. Name of company(s) covered by this certification: **Community Antenna Service, Inc.**
3. Form 499 Filer ID: **826986**
4. Name of signatory: **Arthur Cooper**
5. Title of signatory: **President**
6. Certification:

I, Arthur Cooper, 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 Arthur Cooper

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

47 C.F.R. § 64.2009 Safeguards required for use of customer proprietary network information.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.

(f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.