

Annual 47 C.F.R. 6432009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for: 2017

Date Filed: 02/09/2018

Name of companies covered by this certification: Franklin Telephone Co., Inc. and FranklinVT, LLC

Form 499 Filer ID: 809840/824340

Name of signatory: Kimberly Gates Maynard

Title of signatory: Treasurer/Controller

I, Kimberly Gates Maynard, certify that I am an officer of the companies named above, and acting as an agent of the companies, 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.

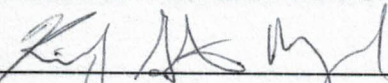
Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The companies have not taken any actions (i.e. proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant 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 misrepresentation to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
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Kimberly Gates Maynard



**STATEMENT OF  
FRANKLIN TELEPHONE CO., INC and FRANKLINVT, LLC  
CONCERNING ITS CUSTOMER PROPRIETARY NETWORK INFORMATION  
RULES, POLICIES, AND COMPLIANCE**

The following rules and policies describe Franklin Telephone Co., Inc. ("FTC") and FranklinVT, LLC ("FVT") 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 FCC's rule 47 C.F.R. § 64.2001 et seq. 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.

It is the policy of FTC and FVT not to use, dissolve, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules.

**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 FTC and FVT's telephone system be utilized for marketing activities.

If at some point in the future FTC and FVT changes its policies with regard to the use of CPNI for sales or marketing purposes it shall comply in all respects with the Commission's rules, including regulations relating to customer rights to opt in or opt out of such campaigns.

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

FTC/FVT shall not release CPNI to customers during customer-initiated telephone contact except when the customer provides a password. If a customer does not provide a password, FTC/FVT may release call detail information by sending it to an address of record or by calling the customer at the telephone of record.

FTC/FVT shall provide mandatory password protection for online account access.

FTC/FVT may provide CPNI to customers based on in-store contact with a valid identification.



FTC/FVT 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**

Kim Gates has been appointed as the CPNI Compliance Officer, and can be reached at 802-285-9911. 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.

- 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 and released.
- Failure to follow the above procedure shall result in disciplinary action.

## **IV. REQUIREMENTS UPON DISCOVERY OF UNAUTHORIZED DISCLOSURE**

In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni>, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section,. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

## **V. TRAINING**

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

## **VI. RECORD KEEPING**

A written record of all requests for, and complaints regarding, CPNI shall be maintained for a minimum of one year

The above rules and procedures area in place to fully protect CPNI in accordance with FCC regulations.