

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: 2-12-2019
2. Name of company(s) covered by this certification: Chaffee County Telecom, LLC dba Colorado Central Telecom
3. Form 499 Filer ID: 830323
4. Name of signatory: Maisie Ramsay
5. Title of signatory: Compliance Officer
6. Certification:

I, Maisie Ramsay, 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 CFR § 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, safeguards, 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 CFR § 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 Maisie Ramsay

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (not applicable)
 Summary of customer complaints (not applicable)

CPNI Compliance Statement and Operating Procedures of Chaffee County Telecom, LLC.

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),¹ Maisie Ramsay, Compliance Officer, of Chaffee County Telecom, LLC ("Company") and affiliated entities makes the following statement:

1. It is the policy of Company not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:
 - a. For the purpose of providing or marketing Company service offerings among categories of service (i.e., local, interexchange) to which the customer already subscribes.
 - b. For the purpose of providing inside wiring installation, maintenance, and repair services.
 - d. For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.
2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. At present, the Company does not engage in outbound marketing using CPNI. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.
3. Because the Company does not use, disclose or permit access to CPNI except as described above, by definition, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.
4. Because the Company does not use CPNI except as described above, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.
5. Company provides access to online account information. Company has taken measures to secure the customer information with proper authentication, including the use of passwords and other methods that comply with FCC rules to protect CPNI.
6. Company has established procedures to verify an incoming caller's identity. Company trains its personnel in both the use of CPNI, and protection of its confidentiality.
7. Customers who contact the Company via inbound calls are not able to access their call detail information.
8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties.
9. The Company did not receive any customer complaints regarding CPNI in 2018 or previous years.
10. 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.
11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.