

Otelco Inc.

505 3<sup>rd</sup> Av E, Oneonta, AL 35121 205.625.3591

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for calendar year 2018

Date signed: February 11, 2019

Names of Companies Covered by this Certification: 499 Filer ID

Blountsville Telephone LLC	803451
Brindlee Mountain Telephone LLC	807789
Hopper Telecommunications LLC	806472
Mid-Maine Telecom LLC	822088
Mid-Maine Telplus LLC	809699
Otelco Mid-Missouri LLC	801801
Otelco Telecommunications LLC	819921
Otelco Telephone LLC	801003
Saco River Telephone LLC	801624
Pine Tree Telephone LLC	801213
CRC Communications LLC	821954
Granby Telephone LLC	805674
War Telephone LLC	805872
Shoreham Telephone LLC	803256

Name of Signatory: Dennis Andrews

Title of Signatory: Senior Vice President

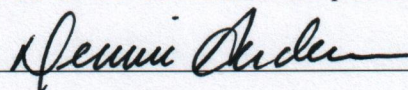
I, Dennis Andrews, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R § 64.2001 *et 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 any 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 

**Attachments:** Accompanying Statement Explaining CPNI Procedures



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**2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**February 11, 2019**

This statement accompanies the Company's 2018 Customer Proprietary network Information (CPNI) Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64 Subpart U unless indicated otherwise.

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(0)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(0)(1)).

**2. Identification of Services Affected by CPNI Rules**

The company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.



**6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible records of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has in place procedures for compliance with Section 64.2010 including, but not limited to the procedures listed below:

The company has implemented procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following 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:

Not applicable. No actions taken against data-brokers.  
No customer complaints received.

**9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.