

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

EB Docket 06-36

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

1. Date filed: February 13, 2019
2. Name of company(s) covered by this certification: Sodtown Telephone Company
3. Form 499 Filer ID: 806649
4. Name of signatory: Mike Plautz
5. Title of signatory: Secretary
6. Certification:

I, Mike Plautz, 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, 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 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

Sodtown Telephone Company
Statement of Procedures for Compliance with CPNI Rules

Sodtown Telephone Company (the "Company") provides local service to approximately 70 customers. The Company does not provide long distance, wireless, Internet or any other type of service to its customers.

The Company has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U - Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

Employee Training

The Secretary of the Board manages the Company and is the only full-time employee and the only person that has access to CPNI. This employee has reviewed and understands the CPNI rules. The Company has a disciplinary process for improper use of CPNI that is based on the type and severity of the violation.

Request for Approval to Use CPNI and Marketing Campaigns

The Company only provides local service and has not asked for approval to use CPNI; thus, the status for all customers is that they have not given approval to use CPNI. The Company does not do any marketing to its customers. The company will not disclose CPNI to any third parties without the customer's express permission to do so.

Authentication

The Company has notified its customers about the FCC rules and made them aware of the fact that they must present a valid photo ID for in-office visits. For telephone-initiated calls, the Company will call the customer back at the telephone number of record. The Company has not established passwords.

Notification of Account Changes

Whenever a change is made to a customer's address, the Company will promptly send a notification to the customer's address of record (address that has been associated with the account for at least 30 days) that a change has been made to the customer's account. The changed data will not be revealed in the notification.

Notification of Breaches

If it is determined that a breach has occurred, the Company will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless the USSS or FBI has requested an extension.
- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

Sodtown Telephone Company
Statement of Procedures for Compliance with CPNI Rules

Notification of Breaches (cont'd)

- Include a summary of the breach in the annual compliance certificate filed with the FCC.

Annual Certification

The Company will file a Compliance Certification signed by an officer of the company with the FCC by March 1 of each year for data pertaining to the previous calendar year. If the Company has taken any action against data brokers or has had any complaints from customers regarding unauthorized release of CPNI, that information will be included in the certification.

Record Retention

The Company will retain its annual certifications with the FCC for a minimum of seven years. Any other information regarding CPNI will be maintained for a minimum of two years.