

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

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

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

Date of execution: February 11, 2019

Name of Company covered by this certification: Kinsman Mutual Telephone Company

Form 499 Filer ID: 804459

Name of Officer signing: Michelle Baudino

Title of Officer signing: Secretary/Treasurer

I, Michelle Baudino, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commission, 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 Michelle Baudino
Michelle Baudino

Accompanying Statement
To 2019 CPNI Annual Certificate covering calendar year 2018
Kinsman Mutual Telephone Company

This accompanying statement explains how Kinsman Mutual Telephone Company, Inc.'s operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U ~ Customer Proprietary Network Information ~ Part 64 of Title 47 of the Code of Federal Regulations.

Kinsman Mutual Telephone Company, Inc. adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Kinsman Mutual Telephone Company's policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that a consumers' inability to opt-out is more than an anomaly.

Kinsman Mutual Telephone Company has on file, with the FCC, its CPNI Manual, without the sample forms as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.