



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

Annual 64.2009(e) CPNI Certification for 2018 covering the prior year 2017

Date Filed: February 13, 2018

Name of company covered by this certification: **North Country Telephone, Inc**

Form 499 filer ID: **804805**

Name of Signatory: Michael Garrett

Title of Signatory: President/CEO

I, Michael Garrett, President/CEO of North Country Telephone Inc. ("NCTI"), 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.

Included with 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 64.2001et seq. of the Commission's rules.

NCTI has not taken any actions against data brokers in the past year nor has NCTI received any customer complaints related to unauthorized access to CPNI, or unauthorized disclosure of CPNI.

NCTI 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.

Sincerely,

A handwritten signature in cursive script that reads 'Michael Garrett'. The signature is written in black ink and is positioned above a horizontal line.

Michael Garrett
President/CEO
North Country Telephone, Inc.
(800) 982-0136 X160
mike.g@aptalaska.com



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North Country Telephone, Inc. (Filer ID 804805) CPNI Operating Statement

As shown in the attached CPNI company policy, North Country Telephone Inc. ("NCTI"), a subsidiary of Alaska Power & Telephone ("AP&T"), does not use customer CPNI in marketing campaigns and no AP&T employee/owner is authorized to sell or distribute CPNI data. Online access to customer account information uses secure passwords for authentication.

Employees have received and will continue to receive training in the handling of CPNI. All employees have received a copy of the attached CPNI policy. Employees are instructed to report any suspected CPNI violations to the corporate office, which will then proceed with FCC reporting regulations.

Sincerely,

A handwritten signature in black ink that reads "Michael Garrett".

Michael Garrett
President/CEO
North Country Telephone, Inc.
(800) 982-0136 X160
mike.g@aptalaska.com

**ALASKA TELEPHONE COMPANY
BETTLES TELEPHONE, INC.
NORTH COUNTRY TELEPHONE, INC.**
(COLLECTIVELY REFERRED TO AS AP&T)

**AP&T WIRELESS, INC.
AP&T LONG DISTANCE, INC.**

Subject: CPNI <u>Customer Proprietary</u> <u>Network Information</u>	Class: Customer Service	Number: CS-01-001
	() Complete Revision (X) Partial Revision () New	Supersedes: Any previous practice

Purpose:

To document the policy and procedures for handling Customer Proprietary Network Information (CPNI) in accordance with the Federal Communications (FCC) rules.

CPNI Definition:

CPNI is information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship.

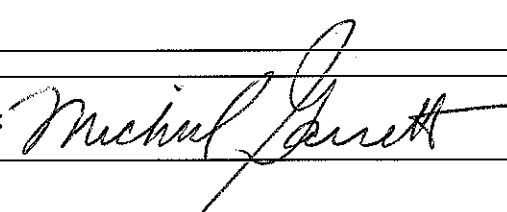
Information contained in the bills pertaining to telephone exchange service or telephone toll service.

Information such as the phone numbers called by a consumer, the frequency, duration, and timing of such calls.

Services purchased by the consumer, such as call waiting.

Statement of Policy:

AP&T will not use customer CPNI data for marketing purposes and no AP&T employee/owner is authorized to sell or distribute CPNI data. AP&T employees will not release CPNI detail information during customer-initiated telephone contact without first establishing the identity of the caller by use of one of the approved FCC methods listed under the procedures below. Violation of these rules will bring strict disciplinary action as set forth in the AP&T Employee Manual.

Issue Date: 10/29/2007	Effective Date: 10/29/2007	Approved by: Executive Vice President: 
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**ALASKA TELEPHONE COMPANY
BETTLES TELEPHONE, INC.
NORTH COUNTRY TELEPHONE, INC.**
(COLLECTIVELY REFERRED TO AS AP&T)

**AP&T WIRELESS, INC.
AP&T LONG DISTANCE, INC.**

Subject: CPNI <u>Customer Proprietary</u> <u>Network Information</u>	Class: <p style="text-align: center;">Customer Service</p>	Number: <p style="text-align: center;">CS-01-001</p>
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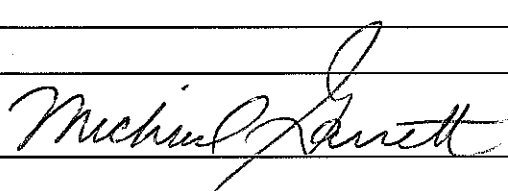
Practice:

Responsibility

Action

All AP&T Employees

1. Establish caller identity prior to the release of CPNI data during customer-initiated telephone contact. Per FCC rules, in the absence of a pre-established password, the following procedures may be used to verify the caller identity or release requested CPNI data:
 - * The customer requested CPNI data may be mailed to the address of record.
 - * The AP&T employee may call the customer back at the telephone number on record and disclose the call detail information.
 - * The customer may come into the AP&T office with a valid photo ID and discuss or pick up the requested information.
2. CPNI information may be disclosed as required by law enforcement.

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