

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: Community Cable Television Company of O'Brien County dba The Community Agency (TCA)
3. Form 499 Filer ID: 821250
4. Name of signatory: DJ Weber
5. Title of signatory: CPNI Officer/General Manager
6. Certification:

I, DJ Weber, 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

**Customer Proprietary Network Information (CPNI)
Documentation of Operating Procedures
for
The Community Agency (TCA)
102 South Eastern Street
Sanborn, Iowa 51248**

- TCA has appointed a CPNI Compliance Officer who is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year for data pertaining to the previous calendar year.
- CPNI rules are reviewed on a regular basis with employees. Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
- TCA has a defined disciplinary process in place for violations and for improper use of CPNI.
- A process that meets the notice requirements of the rules has been developed for notifying customers of their CPNI rights and for requesting approval to use CPNI via the opt-out method.
- Since TCA uses the opt-out method, it provides the CPNI notification to customers every two years. TCA will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly.
- A field on the customer's account record is noted to clearly show the CPNI approval or denial status for the account.
- TCA retains CPNI notification records for a minimum of one year.
- TCA will not provide CPNI to third parties without the customer's affirmative approval to do so.
- TCA has established a process for maintaining a record of any marketing campaign of its own or of its affiliates that uses the CPNI of its customers. Specific details of the campaign will be maintained on a spreadsheet and will be retained for a minimum of one year.
- Management must approve all sales and marketing campaigns. TCA has established a supervisory process for any outbound marketing efforts to ensure that supervisory approval has been obtained for any proposed outbound marketing.
- TCA does not disclose any CPNI until the customer has been appropriately authenticated and has a process that is compliant with the rules for providing call-detail information to customers.
- TCA promptly notifies a customer whenever a change is made to the customer's account either by voicemail to the telephone number of record or to the address of record.
- TCA has a process in place for handling breaches which includes notification to the USSS and FBI via the FCC link at <http://www.fcc.gov/eb/cpni>.
- TCA's CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.