

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: Reinbeck Municipal Telecommunications Utility
3. Form 499 Filer ID: 821456
4. Name of signatory: Dan Smoldt
5. Title of signatory: Chairman
6. Certification:

I, Dan Smoldt, 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.*

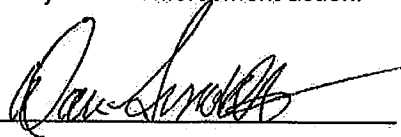
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 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

Reinbeck Municipal Telecommunications Utility
Filer ID 821456
Accompanying Statement to CPNI Compliance Certification
2019 Filing for Data Pertaining to Year 2018

Reinbeck Telecommunications Utility (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.

- The Company has trained all personnel with access to CPNI as to the identification of CPNI and when CPNI may be used.
- The Company has a disciplinary process in place for any improper use of CPNI.
- The Company has a process in place for authenticating customers and that is compliant with the rules for providing call-detail information to customers.
- The Company has notified customers that it will never sell their account information or provide CPNI to other parties, unless required by law enforcement.
- The Company has notified customers of their right to be excluded from marketing efforts outside of the Company's existing relationship with them and has a process within its system that identifies those customers that want to be excluded from marketing efforts. The Company will notify the Commission within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to be excluded from marketing is more than an anomaly.
- The Company does not currently conduct any marketing campaigns using CPNI. If, in the future, the Company decides to have a marketing campaign that uses CPNI, it will establish a supervisory review process and a process for maintaining a record of the campaign before any campaign is conducted.
- The Company has automated the process that sends a notification letter to the customer's address of record for account changes other than a purchase.
- The Company has established a protocol for notification of any unauthorized access to a customer's CPNI and notification of breaches to the USSS and FBI.
- The Company retains all information regarding CPNI as required by the CPNI rules.