



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 13, 2019

Name of Company covered by this certification: Home Telephone Co

Form 499 Filer ID: 807777

Name of Officer signing: Eric Schmidt

Title of Officer signing: President

I, Eric Schmidt, 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 as Exhibit 1 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 
Eric Schmidt - President

Accompanying Statement
To CPNI Annual Certificate for 2019 (covering the prior calendar year 2018)

Home Telephone Co. adheres to all CPNI rules found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations (Sections 64.2001 – 64.2011) concerning the proper use of our customers' CPNI.

Home Telephone Co. has established procedures requiring company personnel to take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Employees must properly authenticate a customer prior to disclosing CPNI.

Home Telephone Co. has implemented a detailed Policies and Procedures Manual on the use, and safeguarding, of CPNI. The CPNI Manual is fully compliant with FCC CPNI rules and must be reviewed and signed by all company employees. In addition, all current Home Telephone Co. employees have been thoroughly trained on the use, and safeguarding, of CPNI and all new employees receive similar training upon hire.

Home Telephone Co. does utilize CPNI for marketing purposes under the process which requires written opt-out documentation. Home Telephone Co. has followed all the procedures applicable to the opt-out method for customer notification and record keeping. Also, Home Telephone Co.'s personnel are trained in the use CPNI for such purposes.

To further protect our customer's privacy, we have implemented all of the safeguards contained in Section 64.2009, except for those related to marketing using the opt-in method, since the company does not use the opt-in procedures. 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 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 Home Telephone Co.'s policies and procedures to ensure compliance with the federal CPNI rules.

Signed  Title President Date 2/13/19