

# LAUREL HIGHLAND LONG DISTANCE COMPANY

Laurel Highland Long Distance Company  
4157 Main Street, P O Box 168  
Stahlstown, PA 15687  
724-593-2411 Phone  
724-593-2417 Fax

February 14, 2019

Marlene H Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

RE: EB-Docket No 06-36  
CPNI Annual Certifications

Dear Ms. Dortch,

Attached please find our company's annual CPNI certification.

Please contact us at 724-593-2411, if you have any questions or require additional information.

Sincerely,



James J Kail  
President & CEO

Attachments

## CERTIFICATE OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

James J Kail signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulation (CFR) Title &4.2009, on behalf of Laurel Highland Long Distance Company. This Certificate of compliance addresses the requirement of FCC's (CFR) Title 47 &64.2009 that the Company provide both a Certificate of Compliance and a "statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 &64.2001-.2011.

On behalf of the Company, I certify as follows:

1. I am the President & CEO of the Company. My business address is

4157 Main St, PO Box 168  
Stahlstown, PA 15687.

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customers' approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of the applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself or Christine Lalor, Regulatory Specialist. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records for customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable



CERTIFICATION OF COMPLIANCE WITH PROTECTION OF CUSTOMER PROPRIETARY  
NETWORK INFORMATION RULES (Cont'd.)

8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or Christine Lalor regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either Christine Lalor or I consult one or more of the following: the FCC's Compliance Guide, and if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either Christine Lalor or I regarding any proposed use of CPNI.
9. Further, both Liz Keslar, Customer Service Manager and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. I also review all notices required by the FCC regulations for compliance therewith.
10. Christine Lalor, Liz Keslar, and I also ensure that the Company enters in confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.
11. Both Christine Lalor and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customers' complaints, and an explanation of breaches.

  
James J Kail, President & CEO

Laurel Highland Long Distance Company  
Company

2.14.19  
Date