ANNUAL 47 C.F.R. §64.2009(e) CPNI CERTIFICATION

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date Filed:	February 15, 2017
Name of Company(s) Covered by this Certification:	City of Wilson
Form 499 Filer ID:	827099
Name of Signatory:	William C. Aycock
Title of Signatory:	General Manager, Greenlight

I, William C. Aycock, 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 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 commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

If affirmative: [Provide explanation of any actions taken against data brokers]

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

If affirmative: [Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]

Signed William C. Aycock [signature]

City of Wilson GL Operational Policy

Date: 2/15/2017

Re: Customer Proprietary Network Information Policy

Use, Disclosure and Access to CPNI

No employee of the City of Wilson shall use, disclose or permit access to its customers' CPNI except as such use, disclosure or access is permitted by section 222 of the Telecommunications Act of 1996. The City of Wilson shall not use CPNI to market services outside of the category of services to which the customer subscribes. The City of Wilson shall not share CPNI with other entities for marketing purposes. The City of Wilson shall maintain records of any and all marketing campaigns that use CPNI.

Call Detail Information

No employee, agent or representative of the City of Wilson shall disclose Call Detail information to any customer during an in-bound call. Call Detail records can be sent to the address of record for the customer in question.

Employee Training

The City of Wilson will distribute its CPNI policy to all personnel that may come into contact with CPNI as part of their job function. The City of Wilson will hold CPNI informational session during staff meetings as required to insure all personnel are aware of policy.

Employee Discipline

Employees found in violation of the CPNI policy are subject to disciplinary actions as prescribed in the City's personnel policy.

Notice of Security Breaches

City of Wilson employees shall notify their supervisor (who will notify executive management) immediately if they discover a security breach that resulted in the unauthorized use, disclosure, or access to CPNI. The City of Wilson shall maintain records of all security breaches and shall report breaches to the Unites States Secret Service, Federal Bureau of Investigation and any impacted customers in accordance with 47 C.F.R 64,2011(e)