

**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 filed: February 15, 2019

Name of company covered by this certification: Rochester Telephone Co., Inc.

Form 499 Filer ID: 801969

Name of signatory: Tami R. Paulik

Title of signatory: Secretary-Treasurer

Certification:

I, Tami R. Paulik, certify that I am an officer of Rochester Telephone Co., Inc., 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 against data brokers in the past year.

The company has not taken any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

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: Tami R Paulik

**Attachments:** Accompanying Statement explaining CPNI procedures