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February 15, 2019

Via Electronic Comment Filing System

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

**Re: Union Springs Telephone Company's Annual 47 C.F.R. § 64.2009(e)
Customer Proprietary Network Information (CPNI) Compliance
Certification for Calendar Year 2018
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Union Springs Telephone Company (collectively, "Union Springs"), please find attached the annual CPNI Compliance Certification for Union Springs for the year 2018 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



Mark D. Wilkerson

Enclosure

cc: Ray Wasden



UNION SPRINGS TELEPHONE COMPANY

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**Marlene H. Dortch, Office of Secretary
Federal Communication Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554**

**Annual 47 C.F.R. Para. 64.2009(e) CPNI Certification
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: February 15, 2019

Name of company covered by this certification: Union Springs Telephone Company

Form 499 Filer ID: 809884

Name of signatory: William H Freeman


Title of signatory: President

I, Dick Freeman, 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. Para. 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 commission, 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.

The company has not received any customer complaints in the past year (2018) concerning 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).

Signed 
William H Freeman
President

Enclosures

UNION SPRINGS TELEPHONE COMPANY, INC.

CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

Categories:

1. **Call Detail Records**
2. **Type of Service**
3. **General Account Information (personal information)**

Safeguarding CPNI

1. Carrier has implemented a system that will properly authenticate a customer prior to disclosing CPNI.
2. Carrier will take reasonable measures to discover and protect against attempts unauthorized access to CPNI.

Customer-Initiated Telephone Contact

1. Carrier will only disclose call detail information by sending it to the customers address of record, or by calling the customer at the telephone number of record.
2. If the customer is able to provide call detail information to Carrier during a customer-initiated call without Carrier's assistance, then Carrier is permitted to discuss the call detail information provided by the customer.

In-store access to CPNI

Carrier may disclose CPNI to a customer at its in-store (customer service) location who presents to the customer service representative a valid ID corresponding to the customer's account information.

Training and express disciplinary process in place

Carrier continually educates and trains its personnel regarding the appropriate use CPNI. Carrier has established a disciplinary procedures should any personnel violate the CPNI procedures.

Notification to law enforcement of breach

1. Carrier will notify law enforcement of a breach of its customers' CPNI. The carrier shall not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or the Commission's rules, until it has completed the process of notifying law enforcement.
2. As soon as practicable, and in no event later than seven business days, after reasonable determination of the breach, the telecommunications carrier shall electronically notify the United States Secret Service (USSS) and the Federal

Bureau of Investigation (FBI) through a central reporting facility. The Commission will maintain a link to the reporting facility at <http://www.fcc.gov/eb/cpni>. Carrier will not notify customers or disclose the breach to the public until seven full business days have passed after notification to the USSS and the FBI, except as provided below.

3. If Carrier believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed, in order to avoid immediate and irreparable harm, it shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. Carrier will cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.
4. If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct Carrier not to so disclose or notify for an initial period of up to 30 days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency.
5. If such direction is given, the agency shall notify the carrier when it appears that public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to the carrier, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writings shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by carriers.

Notification to customer of breach

After Carrier has completed the process of notifying law enforcement, it shall notify its customers of a breach of those customers' CPNI.

Records related to breaches

1. Carriers will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI, and notifications made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
2. Carriers shall retain the record for a minimum of two years.

Records of marketing campaigns using CPNI

1. Carriers will maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Carrier will maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

2. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
3. Carriers shall retain the record for a minimum of one year.

Records of supervisory review process

Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.