



West River Cooperative Telephone Co.

801 Coleman Ave. P. O. Box 39 Bison, SD 57620

February 18, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: EB Docket No. 06-36
 Annual CPNI Certification

Dear Ms. Dortch:

Attached is the annual CPNI certification filing covering the year of 2018, pursuant to 47 C.F.R § 64.2009(e), for West River Cooperative Telephone Company, Filer ID #804501.

Sincerely,

Colle Nash, General Manager

Attachment

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February 18, 2019
2. Name of company(s) covered by this certification: West River Cooperative Tele. Co.
3. Form 499 Filer ID: 804501
4. Name of signatory: Colle Nash
5. Title of signatory: General Manager
6. Certification:

I, Colle Nash, 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 (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, 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.

The company has not received customer complaints in the past year concerning the unauthorized release of

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 Colle Nash

Attachments: Accompanying Statement explaining CPNI procedures

West River Cooperative Telephone Company – FCC 499 Filer ID 804501

Bison, South Dakota

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how West River Cooperative Telephone Company, an ILEC operating in South Dakota (“the Company” or “Company”) is complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2011) and EB Docket No. 06-36.

The Company has appointed a CPNI Compliance Officer. The Compliance Officer is responsible for ensuring that the Company is in compliance with all of the CPNI rules. The Compliance Officer is also the point of contact for anyone (internally or externally) with questions about CPNI.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(g).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization as defined in Section 64.2005 of the FCC rules.

4. Customer Notification and Request for Approval to Use CPNI

The Company has provided notification to its customers of their CPNI rights and has asked for the customer’s approval to use CPNI via the opt-out method. A copy of the notification is also provided to all new customers that sign up for service.

The status of a customer’s CPNI approval is prominently displayed as soon as the customer’s account is accessed so that employees can readily identify customers that have restricted the use of their CPNI.

For the customers that have opted-out and said the Company cannot use their CPNI, that decision will remain valid until the customer changes it.

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The company sends the opt-out notice every two years to those customers that have not previously opted out.

The company does not share the customer's CPNI with any joint venture partner, independent contractor or any other third party.

The Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

5. Training

The Compliance Officer arranges for the training of all employees on an annual basis, and more frequently if needed. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using. The detail of the training can differ based on whether or not the employee has access to CPNI.

After the training, all employees are required to sign a certification that they have received training on the CPNI rules, that they understand the Company's procedures for protecting CPNI and they understand the Company's disciplinary process for improper use of CPNI.

Employees are instructed that if they have any questions regarding the use of CPNI, or if they are aware of CPNI being used improperly by anyone, they should contact the Compliance Officer immediately.

6. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI.

7. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC rules.

8. Authentication of Customer

As required by Section 64.2010 of the FCC rules, the Company does not disclose any CPNI until the customer has been appropriately authenticated as follows:

In-office visit – the customer must provide a valid photo ID matching the customer's account information.

Customer-initiated call from a customer that has established a password – the customer must provide his/her pre-established password and must be listed as a contact on the account.

Customer-initiated call from a customer that has not established a password – the customer is authenticated by providing an answer to a pre-established question and must be listed as a contact on the account.

If the customer wants to discuss call detail information that requires a password, since the customer has not established a password, the following guidelines are followed:

- If the customer can provide all of the call detail information (telephone number called, when it was called, the amount of the call, etc.) necessary to address the customer's issue, the Company will continue with its routine customer care procedures.
- If the customer cannot provide all of the call detail information to address the customer's issue, the Company will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.

9. Notification of Account Changes

As required by Section 64.2010(f), the Company promptly notifies customers whenever a change is made to any of the following:

- Address of record
- Password and/or back-up means of authentication for password
- Contact on the account

10. Notification of Breaches

As required by Section 64.2011, employees will immediately notify the Compliance Officer of any indication of a breach. If it is determined that a breach has occurred, the Compliance Officer will do the following:

- Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>.
- Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless either has requested an extension.

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- If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm, it will be done only after consultation with the relevant investigating agency.
- Maintain a record of the breach, the notifications made to the USSS and FBI, and the notifications made to customers. The record should include dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.

11. Annual Certification

As required by Section 64.2009(e), the Company will file a Compliance Certification with the FCC by March 1 of each year for data pertaining to the previous calendar year. The certification will include whether or not the Company has taken any action against data brokers and whether or not it has received any customer complaints concerning unauthorized release of CPNI.

12. Record Retention

Even though some of the following items may not currently be applicable to the Company, it has established minimum retention periods for all of them as follows:

- CPNI notification and records of approval – two years
- Marketing campaigns – one year
- Breaches – two years
- Annual certification – five years
- Employee training certification – two years
- All other CPNI information – two years