

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 19, 2019

Name of company covered by this certification: Big River Telephone Company, LLC

Form 499 Filer ID: 821170

Name of signatory: Kevin Cantwell

Title of signatory: President

I, Kevin Cantwell, 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.*

The following details how the company's procedures ensure that the company is compliant with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Big River Telephone Company has enacted several steps to ensure full compliance with the Commission's new CPNI rules. All employees have undergone training detailing the stringent rules on the definition of CPNI and under what circumstances and conditions it can be divulged and under what circumstances it is not to be divulged. Significantly, all employees have also been instructed and understand when these rules have been breached and the steps to take if such a breach has found to occur. Each employee has signed a form acknowledging they received training and understand the requirements of the Company's compliance with the FCC rules on CPNI.

Big River has also designated two employees with the responsibility of compliance, training and reporting of the FCC's CPNI rules.

Big River has also implemented new rules for the sharing of information, specifically CPNI, via electronic means along with the security measures required for protecting such information. The security measures, including password assignment and dissemination, have been established and meet the requirements of the FCC's CPNI rules.

Big River is displaying posters in the work areas of customer service employees about the CPNI rules and the legal responsibility to comply with such rules. CPNI rules and the possibility of any breach will be discussed at regular meetings with customer service employees and have been incorporated into the performance review requirements of such employees.

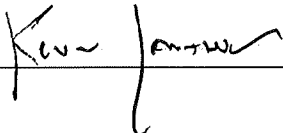
Big River sells and supports its services in many cases via its relationship with various wholesale companies. These services are provided pursuant to Big River contracts, filed tariffs and under

the auspices of Big River's certificate to operate as a telecommunications company in each of the states it provides such services. In this relationship, each of these wholesale companies acts as an agent of Big River and has been contracted to provide some level of customer service support. As such, Big River has conducted training with the customer service employees of all of these wholesale companies and has required the designation of a dedicated CPNI representative who reports any suspicious activity or any breaches back to Big River Telephone. This representative also answers any CPNI questions that come up within the company and communicates them back to Big River. We have also created a form with which to report breaches to ensure we capture all details of a breach and have it on file for our notification to the appropriate authorities.

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.

The Company has not received any customer complaints in the past calendar year concerning unauthorized access to or release of CPNI.

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  [electronic signature]