



**Connie Holthus, Legal Manager**  
405-375-0383 • csholthus@ptcl.com

**Paul I. Schulte, General Counsel**  
405-375-0171 • pischulte@ptcl.com

**Fax: 405-375-6329**

*Taking you forward.*

February 19, 2019

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

Re: 2018 Annual CPNI Certification and  
Accompanying Statement of Pioneer Telephone Cooperative, Inc.  
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), Pioneer Telephone Cooperative, Inc., hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

  
Connie Holthus  
Legal Manager

cc: Best Copy and Printing, Inc.

**EB Docket No. 06-36**

**ANNUAL CERTIFICATION OF CPNI FILING FOR 2018  
PURSUANT TO 47 C.F.R. §64.2009(e)**

**Name of Company: Pioneer Telephone Cooperative, Inc.  
Form 499 Filer ID No. 801747**

**Date Filed: February 19, 2019**

I David Shepard certify that I am an officer of Pioneer Telephone Cooperative, 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 Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

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, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any action against data brokers during the preceding year regarding unauthorized release of CPNI; nor has the Company received any customer complaints concerning the unauthorized access to or unauthorized disclosure 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.



\_\_\_\_\_  
Officer's Signature

David Shepard  
\_\_\_\_\_  
Officer's Printed Name

President  
\_\_\_\_\_  
Officer Title

**STATEMENT OF COMPLIANCE WITH THE  
FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

Pioneer Telephone Cooperative, Inc.'s (the "Company") operating procedures ensure that the Company is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of the Company that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has implemented safeguard procedures to protect our customers' CPNI from pretexters including, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 C.F.R. §64.2010.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.