

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2017

Date Signed: February 19, 2018

Name of Companies Covered by this Certification

499 Filer ID

ETC Communications, L. L. C.

819246

Name of signatory: Cora Payne

Title of signatory: Assistant Secretary and Administration Department Manager

I, Cora Payne, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 procedure ensure the companies are in compliance with the requirements.

The companies have 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 companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The companies 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 companies also acknowledge 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.



Cora Payne
Assistant Secretary and
Administration Department Manager
For Ellijay Telephone Company
and for ETC Communications, LLC

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how ETC Communications, LLC (collectively “the Company” or “Company”) are 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 §§ 64.2000-2009).

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has informed 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(d) of the FCC’s Part 64, Subpart U CPNI rules.

2. Customer Notification and Authorization Process

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC’s Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company’s notification will comply with the requirements of the Section 64.2007(f)(2).

3. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC’s Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC’s CPNI rules.

4. Record Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC’s Part 64, Subpart U CPNI rules.

5. 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’s Part 64, Subpart U CPNI rules.