**TEL TEC., INC.**
**1302 South High School Road**
**Indianapolis, IN 46241**
**(317) 390-8590**

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

Annual 64.2009(e) CPNI Certification for **2016**

Date filed: **February 20, 2017**

Name of company covered by this certification: **Tel Tec, Inc.**

Form 499 Filer ID: **823660**

Name of signatory: **Troy Brosseau**

Title of signatory: **President**

I, Troy Brosseau, 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.*

Attachment A to this certification is a 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 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 year concerning the unauthorized release of CPNI.

Troy Brosseau, President

Attachment

**Attachment A**

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## 2015 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

Tel Tec., Inc. ("Company") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended ("the Act"), and the Federal Communication Commission's ("FCC" or "Commission") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 62.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated to comply with the Commission's CPNI rules, as modified by the Commission in 2007.

1. **Safeguarding Against Pretexting** – The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters or data brokers.

2. **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 Section 64.2003(g) and Section 222(f)(1) of the Act. The Company has also established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI that do and do not require customer authorization under Section 64.2007.

3. **COMPANY's Use of CPNI** – The Company may use CPNI for the following purposes:

   - to initiate, render, maintain, repair, bill and collect for services;
   - to protect against its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
   - to provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent;
   - to market additional services to customers that are within the same categories of service to which the customer already subscribes;
   - to market services formerly known as adjunct-to-basic services; and
   - to market additional services to customers *with the receipt of informed consent via the use of opt-in or opt-out, as applicable.*

4. **Customer Approval & Informed Consent** –The Company has implemented a procedure to obtain approval and informed consent from its customers prior to using CPNI for marketing purposes. Prior to any solicitation for customer approval, the Company notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI.

The Company only uses CPNI to market its own customers; the Company does not disclose CPNI to its affiliates, agents, data brokers, or any other persons or entities. The Company uses opt-out for the marketing of communications related services by its employees outside the category of service to which the customer subscribes. The content of the Company's CPNI notice complies with FCC rule 64.2008(c). the Company provides notification by electronic or written methods and waits at least 30 days after giving customers notice an opportunity to opt-out before assuming customer approval to use CPNI. The Company provides customers with an opt-out notification every 2 years. The Company complies with the additional requirements in FCC rule 64.2008(d)(3), and makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, 7 days a week. The Company maintains records of customer opt-out for at least 1 year. The Company may negotiate alternative authentication procedures for services that it provides to business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

The Company maintains for at least 1 year records of all marketing campaigns that use its customers; CPNI, including a description of each campaign and the CPNI used and the products offered as part of the campaign. Such campaigns are subject to a supervisory approval and compliance review process, the records of which are also maintained for a minimum of 1 year. The Company has in place a supervisory review process to ensure compliance with Section 64.2009(d). The Company will provide written notice to the Commission in accordance with FCC Rule 64.2009(f) if ever its opt-out mechanisms malfunction in the manner described herein.

5. **Procedures Protecting Against Disclosure of CPNI** – The Company has procedures for compliance with Section 64.2010 including, but not limited to the following:

- Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits
- The Company does not presently offer on-line account access and thus, at this time, has not implemented procedures for on-line authentication as described in Section 64.2010(c).
- The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).
- The Company has procedures in place to notify customers of account changes.

6. **Actions Taken Against Data Brokers and Responses to Customer Complaints** – Pursuant to Section 64.2009. the Company states that no actions have been taken

against data brokers, and no customer complaints have been received to date concerning the unauthorized release of CPNI.

7. **Disciplinary Process** – The Company has an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

8. **Procedures for Notifying Law Enforcement of CPNI Security Breaches** – The Company has in place procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.

4. **Customer Approval & Informed Consent** –The Company has implemented a