



CONSULTING

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February 19, 2019

FILED ELECTRONICALLY

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, D.C. 20554

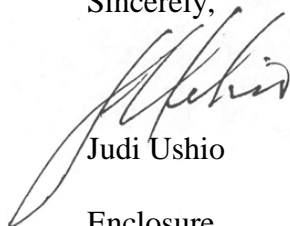
Re: EB Docket No. 06-36
Annual Section 64-2009(e) CPNI Certification
Cass Cable TV, Inc. (499 Filer ID: 827402)

Dear Ms. Dortch:

On behalf of Cass Cable TV, Inc. ("Cass Cable") and pursuant to 47 C.F.R. Section 64.2009(e) of the Commission's rules, I am attaching Cass Cable's Annual CPNI Certification and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,



Judi Ushio

Enclosure

CPNI Compliance Accompanying Statement

Year: 2018

Cass Cable TV, Inc.

This accompanying statement explains Cass Cable TV, Inc.'s operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Cass Cable TV, Inc. adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of Cass Cable TV, Inc.'s policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission within 5 business days of any instance where opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

From: no-reply@fcc.gov
To: [Dawn Cartellone](#)
Subject: [EXTERNAL] FCC ECFS Filing Confirmation
Date: Tuesday, February 19, 2019 1:57:29 PM

Thank you for your submission to the FCC Electronic Comment Filing System (ECFS).
Please Note that your filing will not be available for searching until it has been reviewed and posted by the FCC.

Confirmation Number: 201902192015229472

Proceeding(s): 06-36 : CPNI Compliance Certification Annual Filing

Filer(s): Cass Cable TV, Inc.

Author(s): Judi Ushio

Law firm(s):

Type of Filing: COMPLIANCE FILING

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Report Number:

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Documents(s) Attached: Cass Cable FCC efiled.pdf

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