



McCORMACK / ELLINGTON TELEPHONE COMPANY
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Molly Heady
Vice President

FILED ELECTRONICALLY

February 21, 2019

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(3) CPNI Certification
Ellington Telephone Company (499 Filer ID: 805692)

Dear Ms. Dortch:

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

Please feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Molly Heady", is written over a circular blue ink stamp.

Molly Heady

Enclosures

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018

Date Filed: February 21, 2019

Name of company covered by this certification: Ellington Telephone Company

Form 499 Filer ID: 805692

Name of signatory: Molly E. Heady

Title of signatory: Vice President

I, Molly E. Heady, 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.*

Attached to this certification is an accompanying 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 action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____



Molly E. Heady

CPNI Compliance Accompanying Statement

Year: 2018

Ellington Telephone Company

This accompanying statement explains how Ellington Telephone Company'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.

Ellington Telephone Company 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 a least on 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 Ellington Telephone Company's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission 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.

Ellington Telephone Company has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.