



New Florence New London Orchard Farm Stoutland
Highspeed Broadband Telecommunications
missouricom.com

February 21, 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
Orchard Farm Telephone Company (499 Filer ID: 805470)

Dear Ms. Dortch:

Enclosed for filing is the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification; EB Docket No. 06-36 for Orchard Farm Telephone Company and Accompanying Statement.

Please contact me with any questions or concerns.

Sincerely,

Wendy Ottman, CFO
wendy@missouricom.co
573.835.2997

Missouricom New Florence
101 N Main St
New Florence MO 63363
573 835 2997

Annual 47 C.F.R. 6432009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI 2019 Certification covering the prior calendar year 2018

Date Filed: 02/21/2019

Name of company covered by this certification: Orchard Farm Telephone Company

Form 499 Filer ID: 805470

Name of signatory: Wendy Ottman

Title of signatory: CFO

I, Wendy Ottman, 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 (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 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 company has not received any customer complaints in the past year concerning the unauthorized release 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.

Signed Wendy Ottman
Wendy Ottman

CPNI Compliance Accompanying Statement

Year: 2018

Orchard Farm Telephone Company

This accompanying statement explains how Orchard Farm 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.

Orchard Farm 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 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 Orchard Farm 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.