



Annual 47 CFR § 64.2009(e) CPNI Certification
EB Docket 06-36

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

Date Filed: February 22, 2019

Name of company covered by this certification: **North Country Telephone, Inc.**

Form 499 Filer ID: **804805**

Name of Signatory: Michael Garrett

Title of Signatory: President/CEO

I, Michael Garrett, 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 CFR § 64.2001 *et seq.*

Attached with 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 actions against data brokers in the past year. Neither has the company received any customer complaints in the past year concerning the unauthorized release of CPNI, or unauthorized disclosure of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 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.

Sincerely,

A handwritten signature in cursive script, reading 'Michael Garrett', written in black ink.

Michael Garrett
President/CEO
North Country Telephone, Inc.
(800) 982-0136 X160
mike.g@aptalaska.com



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**North Country Telephone, Inc. (Filer ID 804805) Statement Explaining CPNI
Procedures**

The company takes its CPNI obligations seriously, and believes that its CPNI policy and operating procedures adequately ensure compliance with the Commission's CPNI rules.

The company requires secure passwords for customers to gain access to their CPNI data over the telephone or through the Internet. The company has alternative procedures in place to authenticate the identity of a customer when a password is forgotten. When a customer requests his or her information in person, a photo ID is required. The company trusts that these safeguards ensure that CPNI data is not given to unauthorized individuals.

Company policy prohibits employees from using customer CPNI data for marketing purposes, and employees are expressly prohibited from selling or distributing CPNI data. Employees are subject to strict disciplinary action for any violation of the company's CPNI policy. The company believes restricting employee use of customer information is solid safeguard that prevents the unauthorized use of CPNI data.

Upon hire, employees with access to CPNI data are required to acknowledge that they have read, understand, and agree to the company's CPNI policy. The company relies on intensive annual CPNI training to make certain all employees with access to CPNI data are well-versed with the Commission's rules and the company's policy on CPNI. The company believes this continual training adequately ensures compliance with the Commission's CPNI rules.

Sincerely,

A handwritten signature in black ink, reading 'Michael Garrett', written in a cursive style. The signature is positioned above a horizontal line.

Michael Garrett
President/CEO
North Country Telephone, Inc.
(800) 982-0136 X160
mike.g@aptalaska.com