

Prairie Grove Telephone Company
129 North Mock Street
Prairie Grove, AR 72753
479-846-7200

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

Date filed: **February 19, 2018**

Name of Company covered by this certification: **Prairie Grove Telephone Company**

Form 499 Filer ID: **803307**

Name of signatory: **Rick Reed**

Title of signatory: **General Manager**

I, **Rick Reed**, 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 as Attachment A 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 the 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 customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certificate 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  Gen. Mgr.

Attachments: Attachment A: Accompanying Statement Explaining CPNI Procedures
Attachment B: Explanation of Actions Taken Against Data Brokers
Attachment C: Summary of Customer Complaints

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

Before an agent, independent contractor or joint venture partner may receive or be allowed to access or use the Company's CPNI, the agent's, independent contractor's or joint venture partner's agreement with the Company must contain provisions (or the Company and the agent, independent contractor or joint venture partner must enter into an additional confidentiality agreement which provides) that: (a) the agent, independent contractor or joint venture partner may use the CPNI only for the purpose for which the CPNI has been provided; (b) the agent, independent contractor or joint venture partner may not disclose or distribute the CPNI to, or allow access to the CPNI by, any other party (unless the agent, independent contractor or joint venture partner is expressly and specifically required to do so by a court order); and (c) the agent, independent contractor or joint venture partner must implement appropriate and specific safeguards acceptable to the Company to ensure the confidentiality of the Company's CPNI.

III. Protection of CPNI

1. The Company may, after receiving an appropriate written request from a customer, disclose or provide the customer's CPNI to the customer by sending it to the customer's address or record. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer. The Company will disclose CPNI upon affirmative written request by the customer to any person designated by the customer, but only after the Company calls the customer's telephone number of record and/or sends a notification to the customer's address of record to verify the accuracy of this request.
2. The Company will provide a customer's phone records or other CPNI to a law enforcement agency in accordance with applicable legal requirements.
3. The Company retains all customer passwords and "shared secret" question-answer combinations in secure files that may be accessed only by authorized Company employees who need such information in order to authenticate the identity of customers requesting call detail information over the telephone.
4. Company employees authenticate all telephone requests for CPNI in the same manner whether or not the CPNI consists of call detail information. That is, Company employees must: (a) be furnished the customer's pre-established password (or correct answers to the back-up "shared secret" combinations); (b) send the requested information to the customer's postal or electronic "address of record" (see definition above); or (c) call the customer back

at the customer's "telephone number of record" (see definition above) with the requested information.

5. If a customer subscribes to multiple services offered by the Company and an affiliate, the Company is permitted to share the customer's CPNI regarding such services with its affiliate. If a customer does not subscribe to any telecommunications or non-telecommunications services offered by an affiliate, the Company is not permitted to share the customer's CPNI with the affiliate without the customer's consent pursuant to the appropriate notice and approval procedures set forth in Sections 64.2007, 64.2008 and 64.2009 of the FCC's Rules.

6. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI other than call detail CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules and after the Company authenticates the customer.

The Company discloses or releases call detail information to customers during customer-initiated telephone contacts only when the customer provides a pre-established password. If the customer does not provide a password, call detail information is released only by sending it to the customer's address of record or by the carrier calling the customer at the telephone number of record. If the customer is able to provide to the Company during a customer-initiated telephone call, all of the call detail information necessary to address a customer service issue (*i.e.*, the telephone number called, when it was called, and, if applicable, the amount charged for the call) without Company assistance, then the Company may take routine customer service actions related to such information. (However, under this circumstance, the Company may not disclose to the customer any call detail information about the customer account other than the call detail information that the customer provides without the customer first providing a password.)

7. The Company uses, discloses, and/or permits access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company (out-bound marketing) only pursuant to the notice and approval procedures set forth in Sections 64.2007, 64.2008, and 64.2009 of the FCC's Rules. All proposed out-bound marketing activities are reviewed by the Company's CPNI Compliance Officer for compliance with the CPNI restrictions and requirements in the Communications Act and the FCC Rules.

8. The Company maintains appropriate paper and/or electronic records that allow its employees, independent contractors and joint venture partners to clearly establish the status of each customer's Opt-out and/or Opt-In approvals (if any) prior to use of the customer's CPNI. These records include: (i) the date(s) of any and all of the customer's deemed Opt-out approvals and/or Opt-in approvals, together with the dates of any modifications or revocations of such approvals; and (ii) the type(s) of CPNI use, access, disclosure and/or distribution approved by the customer.