

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

**EB Docket 06-36**

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

Date filed: February 25, 2019

Name of company covered by this certification: **Scott County Telephone Company, Inc.**

Form 499 Filer ID: 803151

Name of signatory: Karen Gilliam

Title of signatory: General Manager

I, Karen Gilliam, 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any 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 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 Karen Gilliam

Attachment: Accompanying Statement explaining CPNI procedures

## **ACCOMPANYING STATEMENT**

This statement explains how Scott County Telephone Company's (the Company's) operating procedures ensure that it is in compliance with the FCC's CPNI rules. The Company's CPNI policy explains what CPNI is, when it may be used without customer approval, and when customer approval is required. Disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.

The Company has internal procedures in place to educate employees about CPNI and the disclosure of CPNI. Employees with access to this information have been trained as to when they are and are not authorized to use or disclose CPNI. In accordance with the Company's disciplinary policy, any employee that uses, discloses, or permits access to CPNI in violation of federal regulations is subject to disciplinary action and possible termination.

The Company has chosen to not use, sell, or otherwise release CPNI for marketing or other commercial purposes.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with 47 C.F.R. §64.2010. Currently, customers of the Company do not have online access to their accounts. Also, the Company does not bill for any toll calls, so there is no CPNI related to call detail information. For customer-initiated incoming calls, it is the Company's policy to properly authenticate the customer to ensure that the calling party is an authorized person on the account. Non-call detail information, such as the bill amount or services provided, can be discussed only after the customer is authenticated using standard procedures, such as verifying personally-identifiable information noted on the account records. Customers are notified immediately whenever an address of record is created or changed.

The Company has appointed a Director for CPNI Compliance to serve as the central point of contact for questions related to CPNI policy and ensure the Company is in compliance with CPNI rules and reports. This includes, but is not limited to, investigating complaints of unauthorized release of CPNI, reporting any breaches to the appropriate law enforcement agencies, coordinating the filing of the annual CPNI certification with the FCC, and coordinating employee training.