

**Lumos Networks Corp.**

**One Lumos Plaza, Waynesboro, VA 22980**

**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 5, 2019

**Names of Companies Covered by this Certification:**

The Holding Company is Lumos Networks Corp.

This CPNI Certification is a consolidated filing for the following affiliated companies (collectively "Company"):

<u>Company</u>	<u>499 Filer ID</u>
Lumos Telephone Inc.	807075
Lumos Networks Inc.	807076
Lumos Networks of West Virginia Inc.	807074
Lumos Telephone of Botetourt Inc.	807819
Lumos Networks LLC	821222
LMK Communication, LLC	821316

Name of signatory: Mary McDermott

Title of signatory: General Counsel


I, Mary McDermott, certify that I am an officer, General Counsel, for Lumos Networks Corp. and the affiliated companies named above (collectively and individually "Company") and that I have personal knowledge that all of the Companies on behalf of which this Certification is filed have established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). 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 actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2018 or related to 2018. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompany statement.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Signed

  
Mary McDermott – General Counsel

**Lumos Networks Corp.  
One Lumos Plaza  
Waynesboro, VA 22980**

**2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE  
February 25, 2019**

The Holding Company is Lumos Networks Corp.

This Annual CPNI Statement is a consolidated report for 2018 for the following affiliated companies (collectively "Company"):

<u>Company</u>	<u>499 Filer ID</u>
Lumos Telephone Inc.	807075
Lumos Networks Inc.	807076
Lumos Networks of West Virginia Inc.	807074
Lumos Telephone of Botetourt Inc.	807819
Lumos Networks LLC	821222
LMK Communications, LLC	821316

This statement accompanies the Company's 2018 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009 (e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 *et seq.*

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

**1. Identification of CPNI**

Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, Company will initiate the notification and Opt-Out process. Company does not provide CPNI to other parties and thus has not used the opt-in approval process. Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

**6. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, Company will develop and utilize a system for maintaining readily accessible records of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

Company provides customers with on-line access to customer account information for which Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

Company has implemented procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

A. No actions taken against data brokers.

None to report

B. CPNI Customer Complaint.

None to report

**9. Disciplinary Process**

Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009 (b).

**10. Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.