

February 26, 2018

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: EB Docket No. 06-36  
Annual CPNI Certification

Dear Ms. Dortch:

On behalf of our client, Sycamore Telephone Company, 499 Filer ID 808413, attached is the annual CPNI certification filing covering the year of 2017, pursuant to 47 C.F.R § 64.2009(e).

Sincerely,



Judy Christiansen  
Consultant

cc: Sycamore Telephone Company

Attachment

**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 26, 2018

Name of company covered by this certification: **Sycamore Telephone Company**

Form 499 Filer ID: **808413**

Name of signatory: **Richard D. Ekleberry II**

Title of signatory: **General Manager**

I, Richard D. Ekleberry II, 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.*

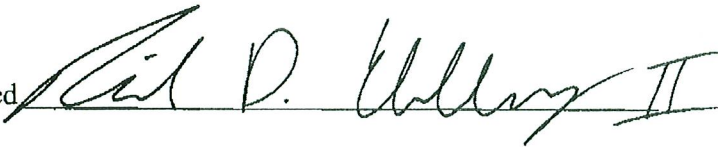
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 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 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 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.

Signed



**Attachments:** Accompanying Statement explaining CPNI procedures

## **SYCAMORE TELEPHONE COMPANY** **STATEMENT OF CPNI PROCEDURES**

Sycamore Telephone Company has created a CPNI Policy Handbook containing the following procedures that it has adopted to ensure the protection of CPNI. The handbook describes our procedures in greater detail and provides practical guidance on how to protect against unauthorized disclosure or use of CPNI. The handbook is distributed to our employees during training and serves as an important reference tool for our employees.

### **Duty to Protect CPNI**

We as a communications company recognize our duty to protect customer CPNI. We may not disclose CPNI to unauthorized persons, nor may we use CPNI in certain ways without consent from our customers. Before we can provide customers with their own CPNI, we must authenticate the customer.

We recognize that there are a few cases in which we can disclose CPNI without first obtaining customer approval:

1. Administrative use: We may use CPNI to *initiate, render, bill and collect* for communications services.
2. Protection of carrier and third parties: We may use CPNI to protect the interests of our company, such as to prevent fraud or illegal use of our systems and network. Employees are notified of the steps to take, if any, in these sorts of situations.
3. As required by law: We may disclose CPNI if we are required to by law, such as through legal process (subpoenas) or in response to requests by law enforcement. Employees are notified of any steps they must take in these situations.

### **Our Own Use Of CPNI**

We may use CPNI to provide or market services to our existing customers. We understand that we are required to obtain customer approval prior to using CPNI in certain ways.

#### Marketing

We understand that we do not need to obtain customer approval before using CPNI to market services to our existing customers within the categories of service to which the customer already subscribes.

We understand that we may not use CPNI to market services that are in a service category to which the customer does not already subscribe without customer approval.

We understand that we cannot use CPNI to solicit a customer to add a new category of service without first obtaining the customer's approval.

We know that we may not share CPNI with our affiliates unless we have obtained customer approval. For instance, in an effort to provide a total package of services, we may share our customers' CPNI with our affiliate, Sycamore Cellular Telephone Company. Before doing so, we obtain opt-out



customer consent. We keep records of this approval on file in accordance with our record-keeping policies.

We also understand that we do not need customer consent before using CPNI to market “adjunct-to-basic” services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain centrex features.

We understand that we may not use CPNI to identify or track customers that call competing service providers.

We regularly review our marketing practices to determine when and how CPNI is used within the company, and whether CPNI is being shared with other entities. We also review new marketing or sales campaigns to ensure compliance with these CPNI policies and with the FCC’s CPNI regulations.

#### Provision of Services

We understand that we do not need customer approval to use CPNI to provide CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

#### Authenticating Customers Before Disclosing CPNI

We understand that we are required to objectively determine that our customers are who they say they are before disclosing CPNI to them.

#### Telephone

We understand that when a customer calls, we may not release *call detail information*, or information relating to the transmission of specific telephone calls until we have called the customer back at the telephone number of record to ensure that the customer is who s/he says s/he is. Alternatively, we may offer to send the call detail information to the address of record or to the customer in person after s/he has produced valid photo identification at our office.

We understand that we may disclose *non-call detail information* over the telephone after authenticating the customer by calling back the telephone number of record, checking valid photo identification, or by mailing the information to the account address of record.

#### In-Person Authentication

We understand that before we can disclose CPNI to customers in person, the customer must present *valid government-issued photo identification*. The name on the photo identification must match the name on the account. If the customer cannot present the required identification, we offer to provide the requested CPNI by sending it to the account address of record.

Before providing the CPNI to the customer, we make a copy of the photo identification. This copy is then placed in the customer’s file, together with a copy of the CPNI provided to the customer. These records are then kept in the customer file in accordance with our record-keeping policies.

### Record-Keeping

We maintain the following records in our files for one (1) year:

- a. Records relating to the annual mailing of the customer CPNI privacy policy;
- b. Records of customer approval or disapproval of CPNI use, or the limitation or revocation thereof;
- c. Records of disclosure or provision of CPNI to third parties for marketing purposes, including Sycamore Telephone Company's and affiliates' sales and marketing campaigns using customer CPNI, the CPNI used, and what products and services were offered as part of the campaign; and
- d. Employee disciplinary records.

We maintain records of discovered CPNI breaches, notifications to law enforcement regarding breaches, and any responses from law enforcement regarding those breaches, in our files for at least two (2) years.

### Notification Of Account Changes

We understand that we are required to notify customers when changes have been made to passwords, customer responses to back-up means of authentication, or addresses of record by mailing a notification to the account address of record.

We do not reveal the changed account data in the notification.

### Unauthorized Disclosure Of CPNI

We understand that we must report CPNI breaches to law enforcement no later than seven (7) business days after determining the breach has occurred, by sending electronic notification through the link at <http://www.fcc.gov/eb/CPNI/> to the central reporting facility, which will then notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI).

We understand that we may not notify customers or the public of the breach earlier than seven (7) days after we have notified law enforcement through the central reporting facility. If we wish to notify customers or the public immediately, where we feel that there is "an extraordinarily urgent need to notify" to avoid "immediate and irreparable harm," we inform law enforcement of our desire to notify and comply with law enforcement's directions.

Records relating to such notifications are kept in accordance with our record-keeping policies. These records include: (i) the date we discovered the breach, (ii) the date we notified law enforcement, (iii) a detailed description of the CPNI breached, and (iv) the circumstances of the breach.

During the course of the year, we compile information regarding pretexter attempts to gain improper access to CPNI, including any breaches or attempted breaches. We include this information in our annual CPNI compliance certification filed with the FCC.

Signed

