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February 26, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S. W., Suite TW-A325
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2019
EB Docket 06-36
Wilson Telephone Company, Inc.

In accordance with the Enforcement Bureau, please find attached Wilson Telephone Company, Inc.'s annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how their operating procedures ensure that they are or are not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have any questions regarding this filing, please direct them to the undersigned at (785) 658-2111 or email boisvert@wilsoncom.us.

Sincerely,

Brian J. Boisvert
CEO/General Manager
Wilson Telephone Company, Inc.

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

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

Date Filed: February 26, 2019

Name of companies covered by this certification: Wilson Telephone Company, Inc.

Form 499 Filer IDs: 803163

Name of signatory: Brian J. Boisvert

Title of signatory: CEO/General Manager

I, Brian J. Boisvert, 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. Section 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 (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.* instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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:


Brian J. Boisvert
CEO/General Manager
Wilson Telephone Company, Inc.

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Wilson Telephone Company, Inc. ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains their personnel annually on the Operating Procedures for properly safeguarding all CPNI. This includes when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them. The Company reserves the right to depart from past disciplinary practices at its sole discretion, when it seems such departure desirable and appropriate.

The Company maintains records of its own and its affiliates' sales and marketing campaigns that use CPNI.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of two years.

The Company notifies a customer immediately of account activity involving a change to an address of record.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, and circumstances of the breach. This log is maintained for a minimum of three years.