

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

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

1. Date filed: 2/26/2019
2. Name of company(s) covered by this certification: Bowling Green Municipal Utilities
3. Form 499 Filer ID: 828847
4. Name of signatory: Teresa Newman
5. Title of signatory: General Services Manager
6. Certification:

I, Teresa Newman, 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 CFR § 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 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. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, 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 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  [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (if applicable)
 Summary of customer complaints (if applicable)

Bowling Green Municipal Utilities CPNI Statement

The Federal Communications Commission (FCC) has rules related to the use of Customer Proprietary Network Information (CPNI) for marketing purposes and also requires carriers and resellers to implement procedures to verify the identity of callers who want to discuss call-detail information or to engage in online transactions that would allow access to account information.

Bowling Green Municipal Utilities (BGMU) is committed to the protection of customer privacy. We comply with federal laws regarding the protection of customer telephone account information. Federal law characterizes this type of information as "Customer Proprietary Network Information" or CPNI referred to as account information. Account information includes information about a customer's telephone services and their use of those services, as well as general billing information. It also includes information concerning specific calls, such as who was called, and the date and time of the call. We refer to call-related information as "call-detail information." It does not include name, address, telephone number, or other types of information such as information about telephone equipment or voice mail.

Rules to Access CPNI

BGMU will verify through questions about account information known to BGMU and the customer or through verification methods such as account number, business name and Federal Tax ID number. BGMU customer service is not able to discuss call-detail information with an account holder unless the caller provides the call detail to the BGMU representative or has a pre-established password.

Online Access to Account Information: Customers seeking online access to account information need a password before access can be permitted. BGMU provides customers with passwords to access online accounts.

Notifications of Certain Account Changes: In addition to access and account information outlined above, BGMU will notify customers of changes when online account is created or changed, or a password has been changed. After an account has been established, when a customer's address (whether postal or e-mail) changes or additions are made to an account, BGMU will send notification by e-mail address, by telephone, or voicemail. .

Marketing: The FCC has categorized consumer CPNI into three groups; local, long distance, and wireless service. BGMU does not resell wireless service. Carriers and resellers are permitted to use CPNI for marketing similar products within a service group.

NOTE: At this time BGMU does not use CPNI to market nor do we sell customer information to third party companies.

Questions or Comments: Bowling Green Municipal Utilities takes seriously our obligation to protect customer information. Our compliance with the rules enacted by the FCC is a continuation of our commitment to our customers. If you have questions about this notice or about our specific commitment to the protection of your information, please contact us at noc@bgmu.com .