



February 26, 2018

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission (FCC)  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for electronic filing in compliance with the FCC customer proprietary network information (CPNI) rules under 47 C.F.R. § 64.2009(e) is the 2017 CPNI annual compliance certification and accompanying statement of operating procedures for Geetingsville Telephone Co., Inc. (499 Filer ID: 805935.)

Please contact me if you have any questions or concerns regarding this filing.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Steven J. Scott', is written over a horizontal line.

Steven J. Scott  
General Manager/CPNI Compliance Manager  
steve@geetel.net  
765-258-3111

Attachments

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

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017 covering the prior calendar year 2016

1. Date filed: February 15, 2018
2. Name of company covered by this certification: Geetingsville Telephone Co., Inc.
3. Form 499 Filer ID: 805935
4. Name of signatory: Steven J. Scott
5. Title of signatory: General Manager/CPNI Compliance Officer
6. Certification:

I, Steven J. Scott, 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, 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 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  (Steven J. Scott)

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

### Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, Geetingsville Telephone Co., Inc., herein referenced as the Company, hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company's board
2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
  - o Established an outbound marketing supervisory review process for the use of CPNI
  - o Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
  - o Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
  - o All customers during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
  - o Call detail is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested call detail:
    - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
    - Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
    - Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
  - o password
  - o customer response to a back-up means of authentication for lost or forgotten passwords
  - o online account
  - o address of record
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
  - o Customers are notified bi-annually of their rights for the use of their CPNI in marketing campaigns
  - o New customers are notified of the opt-out procedure as a part of the customer sign-up process
  - o Billing system displays customer's opting status
  - o Compliance officer retains CPNI notifications and opting records for at least two years
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
  - o Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
  - o Company maintains security of all CPNI, including but not limited to:
    - Documents containing CPNI are shredded
    - Computer terminals are locked when employee is not at the station