

Annual 64.2009 € CPNI Certification for 2018

Date Filed: February 26, 2019

Horry Telephone Cooperative, Inc.

Form 499 Filer ID: 806994

Name of signatory: Wendy G. McCrackin

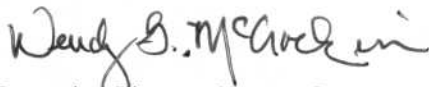
Title of signatory: Executive Director, Human Resources

I, Wendy G. McCrackin, certify that I am an executive of Horry Telephone Cooperative, Inc. ("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 Federal Communications Commission (Commission) Customer Proprietary Network Information ("CPNI") rules. Attached to this certificate 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 of the Commission's rules.

In the past year, the Company has not taken any action against data brokers. The Company does not share CPNI among its affiliates, unless prior customer approval has been obtained or no customer approval is needed. Furthermore, the Company requires all independent contractors granted access to CPNI to enter into an appropriate confidentiality agreement and to abide by applicable laws, regulations, policies, and procedures. The Company does not disclose CPNI to other third parties except as requested by the customer or as compelled or authorized by law.

The Company has not received any substantiated customer complaints in the past year concerning the unauthorized release of CPNI. The Company notifies customers of their rights to restrict access to, use of, and disclosure of their CPNI. Periodic notices and one-time notices are provided to customers as appropriate. Such notices may be provided through multiple methods including bill inserts, customer newsletters, notices published in the telephone directory, notices included on the Company's website, and notices provided during telephone contact. The Company maintains records of all notices and approvals for not less than one year.

Wendy G. McCrackin

A handwritten signature in cursive script, reading "Wendy G. McCrackin".

Executive Director Human Resources
Horry Telephone Cooperative, Inc.

Attachment

Steps Taken By Company to Ensure the Confidentiality of CPNI Records

Horry Telephone Cooperative, Inc. Policy G-34 includes the CPNI Guidelines as listed below.

1. Failure by an employee to abide by the applicable CPNI policies and procedures is cause for discipline, up to and including employment termination.
2. All Company employees during their annual Human Resources Policy review receive an overview of CPNI requirements. (Training rosters are available upon request).
3. All customer-interfacing employees are required to attend CPNI training prior to receiving access to customer's CPNI call detail information. (Training rosters are available upon request).
4. Only job positions with a business need to know are given access to CPNI call detail records.
5. A process is in place for reporting CPNI breaches and includes the completion of an "Incident Report Form."
6. A process is in place for researching and validating CPNI claims.
7. A Company security officer is responsible for investigating reported CPNI breaches.
8. During annual employee performance reviews, employees are reminded of CPNI policy with each employee acknowledging, in writing, his/her understanding of and consent to CPNI rules and procedures.
9. Procedures are in place for the appropriate disposal of CPNI records.
10. Security restrictions are placed on the mailing of CPNI records.