

**Annual 47 CFR § 64.2009(e) CPNI Certification**

**EB Docket**

**06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

1. Date filed: February 26, 2018
2. Name of company(s) covered by this certification: Springport Telephone Co. and Springcom, Inc.
3. Form 499 Filer ID: 804789 and 819997
4. Name of signatory: *[Insert name]*
5. Title of signatory: President
6. Certification:

I, Janet Beilfuss, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have 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 companies' procedures ensure that the companies are 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 companies have not taken against data brokers in the past year.

The companies have not received customer complaints in the past year concerning the unauthorized release of CPNI.

The companies represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The companies also acknowledge 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

*Janet Beilfuss*

### **Statement Explaining How Operating Procedures Ensure Regulatory Compliance**

1. The Companies ensure that they are in compliance with the FCC's CPNI regulations. The Companies train its personnel regarding when they are authorized to use CPNI, when they are not authorized to use CPNI, and how to safeguard CPNI. The Companies maintain a CPNI Compliance Manual in its offices for purposes of training of new and current employees, and as a reference guide for all CPNI issues. Our CPNI Compliance Manual is updated to account for any changes in law relating to CPNI. The CPNI Manual contains key all essential information and forms to ensure the Companies' compliance with CPNI regulations.

2. The Companies have established a system by which the status of a Customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Companies rely on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.

3. Company personnel make no decisions regarding CPNI without first consulting with management.

4. The Companies have an express disciplinary process in place for personnel who make unauthorized use of CPNI.

5. The Companies' policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Companies likewise maintain records of its affiliates' sales and marketing campaigns that use CPNI. The Companies also maintain records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Companies maintain these records in its offices for a minimum of one year.

6. In deciding whether the contemplated use of the CPNI is proper, management consults one or more of the following: the Companies' own compliance manual, the applicable FCC regulations, and, if necessary, legal counsel. The Companies' sales personnel must obtain supervisory approval regarding any proposed use of CPNI.

7. Further, management oversees the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the Customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. Management also reviews all notices required by the FCC regulations for compliance therewith. Before soliciting for approval of the use of a Customer's CPNI, the Companies will notify the Customer of his or her right to restrict use of, disclosure of, and access to, his or her CPNI.

8. The Companies maintain records of Customer approval and disapproval for use of CPNI in a readily-available location that is consulted on an as-needed basis.

9. The Companies train its personnel for compliance with all FCC requirements for the safeguarding of CPNI, including use of passwords and authentication methods for telephone access, online access, and in-store access to CPNI, and the prevention of access to CPNI (and Call Detail Information in particular) by data brokers or "pre-texters." In-store visits require valid photo identification.

10. The Company, on an ongoing basis, reviews changes in law affecting CPNI, and updates and trains company personnel accordingly.

**Explanation of Actions Against Data Brokers**

11. The Companies have not encountered any circumstances requiring it to take any action against a data broker during the year to which this Certificate pertains.

**Summary of all Customer Complaints Received**

12. The following is a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI: None.

13. The Companies do not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.

The Companies represents and warrants that this certification is consistent with 47 CFR 1.17, which requires truthful and accurate statements to the Commission. The Companies also acknowledge 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.

Date:

2/26/18

Janet Beifuss