

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

Date filed: February 20, 2018

Company Name / 499 Filer ID covered by this certification

Hargray Telephone Company, Inc. / 803625

Bluffton Telephone Company, Inc. / 806109

Hargray, Inc. / 821672

Low Country Carriers, LLC d/b/a Hargray Long Distance Company / 801399

Hargray of Georgia, Inc. / 822722

Hargray Communications Group, Inc. / 827444

Name of signatory: Andrew Rein

Title of signatory: Chief Financial Officer

Certification:

I, Andrew Rein, certify that I am an officer of Hargray Communications Group, Inc., Hargray Telephone Company, Inc., Bluffton Telephone Company, Inc., Hargray, Inc., Hargray of Georgia, Inc. and Low Country Carriers, LLC d/b/a Hargray Long Distance Company (collectively and individually "Hargray") and acting as an agent of Hargray, 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 Hargray's procedures ensure that Hargray 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.

Hargray 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.

Hargray has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Hargray represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. Hargray 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



Andrew Rein, CFO

Date February 27, 2018

Attachment: Accompanying Statement explaining CPNI procedures

2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

Hargray Telephone Company, Inc., Bluffton Telephone Company, Inc., Hargray, Inc., Hargray of Georgia, and Low Country Carriers, LLC d/b/a Hargray Long Distance Company and Hargray Communications Group, Inc. (collectively and individually “Hargray”) has established operating procedures that ensure compliance with the Federal Communication Commission (“Commission”) regulations regarding the protection of customer proprietary network information (“CPNI”).

- Hargray has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
 - Hargray sends out an annual opt out notice to its customers as well as a notice to all new customers. This notice is compliant with 64.2008 of the Commission’s rules and is maintained for at least one year.
 - Hargray maintains an electronic record of the response to these notices for use in determining allowable and non-allowable uses of CPNI. The data is stored in the customer record that appears every time a customer service representative accesses a customer’s account.
- Hargray continually educates and trains its employees regarding the appropriate use of CPNI. Hargray has established disciplinary procedures should an employee violate the CPNI procedures established by Hargray.
 - Hargray has specifically trained all employees that have access to CPNI and provided optional training for all other employees. Hargray provides training for new employees regardless of their ability to access CPNI. Both training programs indicate disciplinary actions for improper access to and use of CPNI up to and including dismissal.
- Hargray maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Hargray also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Hargray does not share CPNI with third parties except upon affirmative written request by the customer. In any instances where Hargray uses third parties as part of its marketing efforts, any data that is shared will not include CPNI.
- Hargray has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of compliance for a minimum period of one year. Specifically, Hargray’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

- Hargray has implemented procedures or confirmed existing procedures for compliance with Section 64.2010 including, but not limited to the following:
 - Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits. Hargray maintained its existing procedures for authentication of customers for routine activity such as reviewing services provided, questioning specific charges, or adding and removing specific services. In the unusual instance where the customer requests call detail information, we provide that data over the phone only if the customer has a PIN established. If a PIN has not been established or if the customer cannot remember his/her PIN, Hargray calls the customer back at the designated number, requests that the customer visit the business office and provide photo identification, or mails the information to the address of record. On customer-initiated telephone contacts or business office visits, Hargray does not allow hint questions based on readily available biographical information or account information.
 - Hargray provides customers with on-line access to customer account information only through the use of a password. For on-line access, Hargray does not allow hint questions based on readily available biographical information or account information to access call detail information.
 - Hargray has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and passwords and attempts at access to CPNI through use of back-up methods due to forgotten passwords.
- Pursuant to Section 64.2009, Hargray makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.
- Hargray has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.