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

**EB Docket 06-36**

Annual §64.2009(e) CPNI Certification for **2018**

Date filed: **February 27, 2019**

Name of companies covered by this certification: **The Middleburgh Telephone Company**

**Seamless Geoport Communications, Inc.**

Form 499 Filer ID: **801726**

**815504**

Name of signatory: **Marjorie R. Becker**

Title of signatory: **CEO**

I, Marjorie R. Becker, 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 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 set forth in § 64.2001 *et seq*. of the Commission’s rules.

The Company **has not** taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Company **has not** received any customer complaints in the past year concerning the unauthorized release of CPNI.

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: Marjorie R. Becker, CEO

Electronic signature

Attachments: Accompanying Statement explaining CPNI procedures

**THE MIDDLEBURGH TELEPHONE COMPANY**

**STATEMENT OF COMPANY POLICY**

***When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of The Middleburgh Telephone Company***

The Middleburgh Telephone Company (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

! Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.

! CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.

! Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in the Company’s CPNI Operating Guidelines.

**The release of any CPNI by sales personnel must be authorized by a supervisor.**

**The Company takes seriously the protection of our customers’ CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.**