

**Annual 47 CFR § 64.2009€ CPNI Certification for Calendar Year 2018**

**EB Docket 06-36**

Date Filed: February 27, 2019

Name of Company: Hancock Rural Telephone Corporation d/b/a NineStar Connect

Form 499 Filer ID: 805515

Name of Signatory: Kimberly D. Gerard

Title of Signatory: Assistant Secretary

Certification:

I, Kimberly D. Gerard, 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 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensures 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.

The company has not received 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 CFR § 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 USA Code and may subject it to enforcement action.



Signed:\_\_\_\_\_

Attachments: Accompanying Statement explaining CPNI Procedures

**Statement of Compliance for Calendar Year 2018**  
**Customer Proprietary Network Information (CPNI)**  
**Hancock Rural Telephone Corporation d/b/a NineStar Connect**

- Company policy Article VIII-Section 13, states:

**Compliance with Laws Governing Telecommunications**

The Company will comply with all applicable federal, state and local laws governing telecommunications and the rules and regulations of the Federal Communications Commission, the Federal Trade Commission and the Indiana Utility Regulatory Commission.

All employees are specifically required to protect customer proprietary network information (CPNI) and strictly adhere to the Company's Red Flag Procedures. No employee will permit any CPNI to be given to any third parties, nor provided to any customer without proper identity authentication unless specifically directed to do so by his or her supervisor. CPNI does not include any information published in any telephone directory.

The President shall designate a CPNI Compliance Manager who shall be responsible to educate and inform employees concerning relevant federal, state and local laws governing telecommunications as well as FCC, FTC, IURC and Red Flag rules and regulations.

New employees shall receive education on CPNI and Red Flag compliance within their first thirty (30) days of employment with the Company. Any questions by employees involving federal, state or local laws or the rules and regulations of the FCC, FTC or the IURC should be directed to either the President or Vice President and General Counsel.

Any employees violating any federal, state or local laws governing telecommunications or the rules or regulations of the FCC, FTC or IURC are subject to disciplinary action, up to and including termination.

- Employees that regularly deal with CPNI were trained relative to the new rules beginning September 3, 2007 to ensure the proper handling of CDR's, and customer data.
- Effective December 1, 2007, appropriate account change notification was sent to customers at the address of record.
- A CPNI Compliance Officer was named in September 2007.
- Opt-out letters were mailed in September 2007, September 2009, October 2011, October 2013, December 2015, and December 2017.
- In 2018, 1 new employee received CPNI training within their first thirty (30) days of employment.
- Adoption and disbursement of a new CPNI manual occurred on February 20, 2008. New employees receive their CPNI manual during their CPNI training.