

Appendix "A"

**Arapahoe Telephone Company, d/b/a ATC Communications,
and Applied Communications Technology, Inc.
Certification of CPNI Filing 03/01/2019**

Employee Training:

For the previous calendar year, all new employees and all existing employees on an on-going annual basis have been trained on the CPNI rules. The training includes but is not limited to:

- 1) When employees are and are not authorized to use CPNI;
- 2) The authentication methods used by ATC Communications and Applied Communications Technology, Inc.;
- 3) The disciplinary rules for breach of CPNI; and
- 4) The reporting requirements if there is a breach of CPNI.

Disciplinary Process:

ATC and ACT have established a disciplinary process for breaches of its CPNI policy. This policy is set forth in their joint CPNI Policy Manual and the ATC Employee Handbook.

Opt-Out Method:

ATC and ACT have adopted the "Opt-Out" method and provide notice to all their new customers at the time service is requested and every two years thereafter. Opt-outs are recorded at the time the companies receive the customer's opt-out request.

Actions Taken Against Data Brokers:

The following actions were taken against data brokers since the last certification:

None

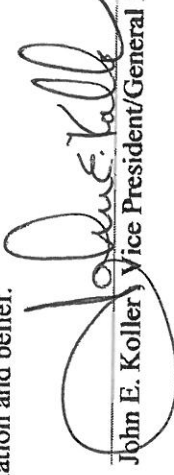
Summary of Customer Complaints Regarding Unauthorized Release of CPNI:

None

In accordance with 47 CFR § 64.2009(E) I, John E. Koller, Vice President and General Manager, of Arapahoe Telephone Company, d/b/a ATC Communications, and of Applied Communications Technology, Inc. hereby certify that for the year 2018 have personal knowledge that each company has established operating procedures described above in its joint CPNI Policy Manual and that it complies with the FCC's CPNI rules.

I hereby certify that the information in this certificate and the attached documentation is accurate and complete to the best of my knowledge, information and belief.

Dated this 23rd day of February, 2019.


John E. Koller, Vice President/General Manager