



C.R.S.T. Telephone Authority

CERTIFICATION OF CPNI FILING, FEBRUARY 28, 2019

{Section 64.2009 (e) of FCC RULES}

EB-06-TC-060

EB DOCKET NO. 06-36

I certify that I am an officer of the Cheyenne River Sioux Tribe (C.R.S.T.) Telephone Authority and that I have personal knowledge that the C.R.S.T. Telephone Authority has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. §§ 64.2001 through 64.2009). The attached statement of CPNI compliance explains how the C.R.S.T. Telephone Authority's operating procedures ensure that it is in compliance with the foregoing FCC rules.

I am making this certification for 2018.

Bobbie L. Traversie

Bobbie L. Traversie – Compliance Officer

Mona L. Thompson

Mona L. Thompson- General Manager

February 28, 2019

CHEYENNE RIVER TRIBE TELEPHONE AUTHORITY

STATEMENT OF CPNI COMPLIANCE

The Cheyenne River Sioux Tribe Telephone Authority provides telecommunications services to the Cheyenne River Sioux Reservation in north-central South Dakota. The following statement explains how the Tribe ensures that its operating procedures and employee conduct are in compliance with the FCC's rules governing Customer Proprietary Network Information.

I. Customer Proprietary Network Information ("CPNI")

CPNI is defined in Section 222(f) of the Communications Act as (A) information that relates to the quantity, technical configuration, type, destination, 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; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a customer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a customer; (b) the length of a customer's phone calls, and (c) the telecommunications and information services purchased by a customer.

II. Use of CPNI Is Restricted

In providing telecommunications services, the C.R.S.T. Telephone Authority recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Tribe.

C.R.S.T. Telephone Authority employees and agents that deal with CPNI have and will continue to be informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access C.R.S.T. Telephone Authority's CPNI, employees and agents receive training with respect to the FCC's CPNI rules.

III. Permissible Uses of CPNI

C.R.S.T. Telephone Authority employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the Company, except as follows:

1. The Company may, after receiving an appropriate request, establishing a password or receiving authentication from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. All such customer requests (1) must be in memo form from business organizations; (2) customer must give correct password; (3) if in person, customer must provide photo I.D.; (4) CPNI authorization form must be filled out by customer designating an authorized individual(s); (5) company employees may call the phone number of record and authenticate the customer either by asking a few pointed questions such as how long have you had service with our organization, some of the features that are subscribed to, etc.
2. In the absence of an appropriate written request from the customer, C.R.S.T. Telephone Authority may provide the customer's phone records or other CPNI to a law enforcement agency but only in response to a lawful warrant or subpoena that specifies the particular CPNI to be furnished.
3. Otherwise, C.R.S.T. Telephone Authority does not use its CPNI for any purpose other than billing its customers, except as shown as 4 and 5 below.
4. The Company and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications services from which the CPNI is derived.
 - a. The FCC has noted the publishing of directories as an example of this permitted use.
 - b. The FCC has indicated that telecommunication carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.
 - c. The FCC has stated that local exchange carriers and commercial radio service may use CPNI, without customer approval to market "adjunct-to-basic" services such as speed dialing, computer provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, calling tracking, call waiting, caller ID, call forwarding, and certain other call features.
 - d. No other uses of CPNI are permitted. However, C.R.S.T. Telephone Authority may use CPNI to protect C.R.S.T. Telephone Authority's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.
5. C.R.S.T. Telephone Authority may use, disclose, or permit access to CPNI derived from its provisions of local exchange service or long distance service, without the customer's approval, to provide customer premises equipment ("CPE), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.
6. C.R.S.T. Telephone Authority presently does not allow use of its CPNI by its cable TV affiliate and will not allow such use by any other affiliate. However, C.R.S.T. Telephone Authority does not foreclose the possibility that it may in the future allow such use by an affiliate, but only in accordance with the 'opt-in, opt-out' procedures in Sections 64.2007 and 64.2008 of the FCC's Rules.

IV. Disciplinary Procedures

The Company has informed its employees and agents that it considers compliance with the C.R.S.T. Telephone Authority's procedures regarding the use, disclosure, and access to CPNI to be very important. Violations of these procedures and other policies and procedures regarding C.R.S.T. Telephone Authority's provision of telecommunications services to the Cheyenne River Sioux Tribe Reservation will subject the offenders to appropriate disciplinary action depending upon the nature and circumstances of the violation.

Annual 47 C.F.R. Section 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year (2018)

1. Date Filed: February 28, 2019
2. Name of company(s) covered by this certification: Cheyenne River Sioux Tribe Telephone Authority
3. Form 499 Filer ID: 809682
4. Name of signatory: Mona L. Thompson
5. Title of signatory: General Manager
6. Certification:

I, Mona L. Thompson, 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 C.F.R. Section 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 (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 C.F.R. Section 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 
General Manager

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)