

Annual 47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI) Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

Date filed: February 28, 2018

Name of company covered by this certification: Sierra Telephone Company, Inc.

Form 499 Filer ID: 806877

Name of signatory: Cynthia A. Huber

Title of signatory: President

I, Cynthia A. Huber, 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. § 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. See Exhibit 1.

Sierra Telephone Company, Inc. (Sierra Telephone) has not taken any 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 in the past year.

Sierra Telephone did experience one breach of its system during 2017 involving an employee exceeding authorization and intentionally gaining access to customer CPNI. Immediately upon discovery, the employee was restricted from accessing all Company CPNI and the Sierra Telephone CPNI Compliance Officer, as prescribed in section 64.2011, conducted a full investigation and notified law enforcement. Concluding law enforcement review, no further action was taken. Appropriate prescribed company disciplinary actions were taken according to Sierra Telephone CPNI policy.

Sierra Telephone has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Sierra Telephone 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. Sierra Telephone 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   
Cynthia A. Huber  
President  
Sierra Telephone

Attachment: Exhibit 1