

# **Annual 47 CFR §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 26, 2019
2. Name of company(s) covered by this certification: Mukluk Telephone Company, Inc.
3. Form 499 Filer ID: 809064
4. Name of signatory: David J. Goggins
5. Title of signatory: President and General Manager
6. Certification:

I, David J. Goggins, 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 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 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 U.S. Code and may subject it to enforcement action.

Signed



David J. Goggins, President and General Manager  
TelAlaska, Inc. d/b/a Mukluk Telephone Company, Inc.  
201 E 56<sup>th</sup> Avenue  
Anchorage, AK 99518  
(907) 563-2003

**Attachments:**      Accompanying Statement explaining CPNI procedures  
                             Explanation of actions taken against data brokers  
                             Summary of customer complaints

**CPNI Compliance Accompanying Statement:**


This accompanying statement explains how TelAlaska, Inc. d/b/a Mukluk Telephone Company's (hereafter the "Company") operating procedures ensure that the Company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

The Company adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of the Company's policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

In addition, to the foregoing acknowledgments, and incorporated as part of this certification, the Company upon request will provide the Federal Communications Commission with a copy of the TelAlaska, Inc. CPNI policy and procedures manual that is used to insure compliance with the Commission's restriction on the use of CPNI (such as distinguishing the CPNI of customers who have not consented to the Company's use of this information for marketing purposes).

I hereby certify that the statements contained within this certification and within its incorporated CPNI Policy and Procedures Manual are accurate and complete to the best of my ability.



David J. Goggins, President and General Manager  
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### **Explanation of Actions Taken Against Data Brokers**

TelAlaska, Inc. d/b/a Mukluk Telephone Company, Inc. has not encountered any circumstances requiring it to take any action against data brokers during the past year.

### **Summary of Customer Complaints**

TelAlaska, Inc. d/b/a Mukluk Telephone Company, Inc. provides that no customer complaints were received in the past year concerning the unauthorized release of CPNI.