

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

Annual 64.2009(e) CPNI Certification for: 2018

Date Filed: 02/25/2019

Name of Company covered by this certification: **Yelcot Telephone Company, Inc.**

Form 499 Filer ID: **801189**

Name of signatory: **Sara Zimmerman**

Title of signatory: **President**

Certification:


I, **SARA ZIMMERMAN**, 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release or disclosure 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: 

SARA ZIMMERMAN, President

Statement of CPNI Compliance Procedures  
Of  
**YELCOT TELEPHONE COMPANY**

The policy of the Company is to comply with both the letter and spirit of all laws of the United States, including those pertaining to CPNI contained in § 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's regulations, 47 CFR 64.2001-.2009. The Company's policy is to rely on the involvement of high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred. Special training of all employees with CPNI access is also a priority.

The FCC's regulations, 47 CFR 64.2009, require the Company to implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI, and to train its personnel as to when they are, and are not, authorized to use CPNI, and to have an express disciplinary process in place. The Company has compiled a manual, which constitutes the Company's policies and procedures related to CPNI. The law and regulations are a part of the manual. All employees are required to follow the policies and procedures specified in this Manual. The Company's employees have received training on these policies and procedures. The Company's management has been trained to ensure that strict compliance to this manual is achieved. The Company's operating procedures ensure compliance with the CPNI rules, which include new carrier authentication requirements, a requirement to notify customers of account changes, and a requirement to notify both law enforcement and customers in the event of a CPNI breach.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

The Company places an emphasis on CPNI protection and compliance. Training and teamwork on CPNI compliance are a focus in staff meetings.