

February 28, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington D.C. 20554

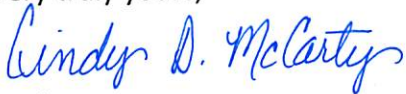
RE: EB Docket No. 06-36
East Kentucky Network, LLC d/b/a Appalachian Wireless (Filer ID: 802104)
Annual CPNI Compliance Certification

Dear Ms. Dortch:

Please find attached for filing the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification filed on behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless.

Should you have any questions or concerns regarding this submission, please contact me. Thank you for your assistance.

Very truly yours,



Cindy D. McCarty
In-House Counsel
(606) 339-1006
cmccarty@ekn.com

Enclosures

Annual 47 CFR § 64.2009(e) 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

Company Name: East Kentucky Network, LLC d/b/a Appalachian Wireless

Form 499 Filer ID: 802104

Name of signatory: W.A. Gillum

Title of signatory: CEO/General Manager

CERTIFICATION

I, W.A. Gillum, 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, safeguards, 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 received one (1) customer complaint in the past year concerning the unauthorized release of CPNI. Please see attached summary.

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: /s/ W.A. Gillum
W.A. Gillum
CEO/General Manager

Attachments: Accompanying Statement explaining CPNI procedures
Summary of Customer Complaint

STATEMENT

East Kentucky Network, LLC d/b/a Appalachian Wireless (“Company”) has established operating procedures that ensure compliance with the Federal Communications Commission (“Commission”) regulations regarding the protection of Customer Proprietary Network Information (“CPNI”).

- Company has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Company has a system implemented whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.
- Company continually educates and trains its employees regarding the appropriate use of CPNI. Company has established disciplinary procedures should an employee violate the CPNI procedures.
- Company does not use its customer’s CPNI in its or its affiliates’ sales and marketing campaigns. Company does not conduct outbound marketing to its customers. Company does not provide an opt-in election to its customers; controls are established to automatically designate all customers as selecting an opt-out election.
- Company has procedures implemented to properly authenticate customers prior to disclosing CPNI over the telephone, at Company’s retail locations or otherwise. Company has established a password system and back-up authentication methods for all customers and accounts, which complies with the requirements of applicable Commission rules.
- Company has procedures established to ensure that customers will be notified of account changes including changes to passwords or address of record, as well as a backup means of authentication for lost or forgotten passwords.
- Company has procedures established to notify law enforcement, appropriate agencies, and customer(s) of unauthorized disclosure of CPNI, in accordance with Commission timelines.
- Company has found that pretexters are continuing their attempts to access CPNI through telephone calls and customer impersonation. Company’s utilization of a passcode/pin-code system to properly authenticate customers, plus additional verification procedures, protects CPNI.
- Company took no actions against data brokers in the calendar year 2017, including proceedings instituted or petitions filed by Company at a state commission, in the court system, or at the Commission.

SUMMARY OF CUSTOMER COMPLAINTS

* Number of customer complaints Company received in the calendar year 2017, related to unauthorized access to CPNI or unauthorized disclosure of CPNI: 1

* Category of Complaint:

0 Number of instances of improper access by employees.

1 Number of instances of improper disclosure to individuals not authorized to receive the information.

- 1) A customer alleged that one of Company's employees accessed the customer's account and provided CPNI to the customer's spouse, who was not authorized to receive the information. The employee denied the allegations. However, the database reflected that the employee had, in fact, accessed the customer's CPNI on the dates in question, and the employee could not give any valid reason for accessing the account. In addition, the employee failed to make any journal entry at the time of accessing the account, which is a violation of Company procedures and training. The incident was reported to appropriate authorities in accordance with the law, and appropriate disciplinary action was taken against the employee.

0 Number of instances of improper access to online information by individuals not authorized to view the information.

0 Number of other instances of improper access or disclosure.