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*Via ELECTRONIC FILING*

February 28, 2019

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**EB Docket No. 06-36**

**Re: CERTIFICATION OF CPNI COMPLIANCE FILING**

Wilkes Telephone Membership Corporation	499 Filer ID # 803832
Wilkes Communications, Inc.	499 Filer ID # 824890
Barnardsville Telephone Company <i>dba</i> RiverStreet Networks	499 Filer ID# 806562
Ellerbe Telephone Company <i>dba</i> RiverStreet Networks	499 Filer ID # 801657
ETCOM, LLC <i>dba</i> RiverStreet Networks	499 Filer ID # 819090
Service Telephone Co. <i>dba</i> RiverStreet Networks	499 Filer ID# 806601
Saluda Mountain Telephone Company <i>dba</i> RiverStreet Networks	499 Filer ID# 806616
RiverStreet Communications of VA, Inc	499 Filer ID# 831268
RiverStreet Communications of NC, Inc.	499 Filer ID# 831269
Gamewood Technology Group, Inc. <i>dba</i> RiverStreet Networks	499 Filer ID# 830377

Dear Ms. Dortch:

Wilkes Telephone Membership Corporation, (WTMC) is filing the attached 2018 CPNI Certification. If there are any questions, I can be reached at 336-973-3103.

Sincerely,

Eric S. Cramer  
CEO

Attachment





Wilkes Telephone Membership Corporation  
**CERTIFICATION OF CPNI FILING**  
[Section 64.2009(e) of FCC Rules]

**EB-06-TC-060**  
**EB DOCKET NO. 06-36**

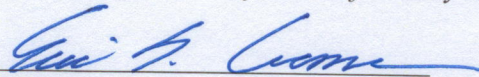
I hereby certify that I am an Officer of Wilkes Telephone Membership Corporation.

I have personal knowledge that Wilkes Telephone Membership Corporation and its affiliates, have 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 Wilkes Telephone Membership Corporation's and affiliates' operating procedures ensure that it is in compliance with the foregoing FCC rules.

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

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

*I am making this certification for the year 2018.*

  
**Signature**

Eric S. Cramer  
**Printed Name**

Chief Executive Officer  
**Title**

2/28/2019  
**Date**



**Wilkes Telephone Membership Corporation**  
**STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Wilkes Telephone Membership Corporation family of companies (collectively, Wilkes Telephone Membership Corporation) is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

**1. Integrated Nature of CPNI Practices**

Wilkes Telephone Membership Corporation is a family of affiliated companies providing telecommunications services. FCC rules require that Wilkes Telephone Membership Corporation has separate affiliates for some services, but allows those separate affiliates to have common employees. Wilkes Telephone Membership Corporation is made up of the incumbent local exchange company, a long distance subsidiary and Internet group. Customers may not always be aware that different, individual affiliates of Wilkes Telephone Membership Corporation provide them with specific telecommunications services. Wilkes Telephone Membership Corporation affiliates include the following companies:

(Wilkes Telecommunications, Wilkes Communications)

No matter which of the Wilkes Telephone Membership Corporation affiliates provides a service, the employees of a single affiliate may provide customer service and support to the customers of the other affiliates. In other cases, employees may be dedicated to a single Wilkes Telephone Membership Corporation affiliate but still rely on operational support systems common to all of Wilkes Telephone Membership Corporation affiliates. Thus, Wilkes Telephone Membership Corporation practices for complying with the FCC's CPNI rules are on an integrated Wilkes Telephone Membership Corporation basis. References to "employees" in this document refer to employees of Wilkes Telephone Membership Corporation as a whole.

**2. CPNI Compliance Officer**

In addition to the specific matters required to be reviewed and approved by the Wilkes Telephone Membership Corporation CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of Wilkes Telephone Membership Corporation CPNI Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a

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material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

**3. Identification of Services Affected by CPNI Rules**

Wilkes Telephone Membership Corporation has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how Wilkes Telephone Membership Corporation uses CPNI. These services are:

Telecommunications Services:

- Local (ILEC)
- Interexchange (long distance)
- Commercial Mobile Radio Services (Wireless)

Non-telecommunications Services

- Internet
- Voice Mail
- Inside Wiring
- CPE (Customer Premise Equipment)

**4. Use of CPNI Is Restricted**

Wilkes Telephone Membership Corporation 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 Wilkes Telephone Membership Corporation.

Wilkes Telephone Membership Corporation has designated a CPNI Compliance Officer who is responsible for: (1) communicating with Wilkes Telephone Membership Corporation attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Wilkes Telephone Membership Corporation employees and agents who use or have access to CPNI; and (3) receiving, reviewing and resolving any questions or issues arising within Wilkes Telephone Membership Corporation regarding use, disclosure, or provision of access to CPNI.

Wilkes Telephone Membership Corporation employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access Wilkes Telephone Membership Corporation CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

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**5. Permissible Uses of CPNI**

Wilkes Telephone Membership Corporation employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside Wilkes Telephone Membership Corporation, except as follows:

1. Wilkes Telephone Membership Corporation may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, Wilkes Telephone Membership Corporation may provide the customer's phone records or other CPNI to a law enforcement agency only in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. Wilkes Telephone Membership Corporation may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, Wilkes Telephone Membership Corporation may use the CPNI from its provision of local exchange service to a customer to provide or market new, additional or modified local exchange service offerings to the customer. Likewise, Wilkes Telephone Membership Corporation may use the CPNI from its provision of long distance toll service to a customer to provide or market new, additional or modified long distance toll service offerings to the customer.

4. Wilkes Telephone Membership Corporation 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 service 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 telecommunications 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 mobile radio service providers 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, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

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d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by Wilkes Telephone Membership Corporation CPNI Compliance Officer.

5. Wilkes Telephone Membership Corporation, its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. Wilkes Telephone Membership Corporation may use CPNI to protect Wilkes Telephone Membership Corporation 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.

7. Wilkes Telephone Membership Corporation may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange 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.

8. If a customer subscribes to more than one category of service offered by Wilkes Telephone Membership Corporation, Wilkes Telephone Membership Corporation is permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

If a customer does not subscribe to more than one offering by Wilkes Telephone Membership Corporation, Wilkes Telephone Membership Corporation is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth in Sections 64.2007, 64.2008 and 64.2009 of the FCC's Rules.]

9. When an existing customer calls Wilkes Telephone Membership Corporation to inquire about or order new, additional or modified services (in-bound marketing), Wilkes Telephone Membership Corporation may use the customer's CPNI to assist the customer for the duration of the customer's call if Wilkes Telephone Membership Corporation provides the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

**6. Customer Notification and Authorization Process**

Wilkes Telephone Membership Corporation has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008.