

ANNUAL § 64.2009(e) CPNI CERTIFICATION FOR 2017

1. Date filed: February 28, 2019
2. Name of company(s): DCM Cable, Inc.
3. Form 499 Filer ID: 828372
4. Name of signatory: Guy Woolbright
5. Title of signatory: CFO
6. Certification:

I, Guy Woolbright, certify that I am an officer of DCM Cable, Inc. ("DCM"), and acting as an agent of Company, that I have personal knowledge that Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is a statement explaining how Company's procedures ensure that 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.

DCM 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 in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

DCM has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

DCM 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. DCM 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.

Name: C. Woolbright

Title: CFO

Date: 2-1-19

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Company (“DCM”) has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with Federal Communications Commission rules governing Customer Proprietary Network Information (“CPNI”), codified at 47 C.F.R. § 64.2001 *et seq.*

The following operating procedures are intended to ensure that Company complies with the CPNI Rules:

1. DCM does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by the law.
2. DCM only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. DCM does not use its customers’ CPNI for any marketing purpose, either internal or external, or any other purpose set forth in the CPNI Rules.
3. DCM has established the following practices and procedures governing the disclosure of CPNI:
 - (a) DCM does not disclose or release CPNI upon a customer’s telephone request except under the following circumstances: (i) DCM verifies the identity of the caller by return call to the telephone number of record in the customer’s file; (ii) DCM sends the CPNI to the customer’s address of record in the customer’s file; or (iii) for business customers, through the customer’s dedicated account manager.
 - (b) DCM automatically notifies customers (at the customer’s original telephone number or address on file) in case any changes are made to the customer’s primary account information.
 - (c) DCM has implemented procedures to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.
4. DCM has trained its personnel to not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI, in accordance with the operating procedures described above. DCM has established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations. DCM maintains records of carrier compliance for a minimum of one year.
5. Because DCM does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to so

by customers), it has not implemented either “opt-in” or “opt-out” CPNI approval procedures, *see* 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures, *see* C.F.R. § 64.2008.

6. In the event that DCM in the future plans to utilize CPNI to provide CPNI to other entities other than as described above, it will first provide customers notification of their CPNI rights as required by 47 C.F.R. § 64.2008.
7. It is a violation of DCM policies to disclose CPNI outside of Company. Any employee found to have violated this policy will be subject to disciplinary action up to and including termination.
8. Access to CPNI at DCM is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.
9. Controls are in place involving responses to law enforcement agencies that serve DCM with valid legal demands, such as a court ordered subpoena, for CPNI. DCM will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.