

Annual 47 C.F.R. § 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: March 1, 2019
2. Name of company(s) covered by this certification: Allamakee-Clayton Electric
3. Form 499 Filer ID: 831077
4. Name of signatory: David Decker
5. Title of signatory: Director of Finance and Administrative Services
6. Certification:

I, *David Decker*, 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 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 C.F.R. § 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



Attachments: Accompanying Statement explaining CPNI procedures

Allamakee-Clayton Electric Cooperative, Inc.
Filer ID 831077
Accompanying Statement to CPNI Compliance Certification
2019 Filing for Data Pertaining to Year 2018

Allamakee-Clayton Electric Cooperative, Inc. (the "Company") has implemented the following procedures to ensure that it is compliant with Part 64 of Title 47 of the Code of Federal Regulations, Subpart U – Customer Proprietary Network Information (CPNI), § 64.2001 through § 64.2011.

- The Company has appointed a CPNI Compliance Officer who is responsible for ensuring that the Company complies with the CPNI rules. The Compliance Officer will file a Compliance Certification with the FCC by March 1 of each year for data pertaining to the previous calendar year.
- The Compliance Officer arranges annual training for all employees. Any new employee is trained when hired by the Company. The training includes, but is not limited to, when employees are and are not authorized to use CPNI. The employees are also trained on the authentication methods that the company has established for customer-initiated incoming calls. All customers coming into the office must provide a government issued valid photo ID matching the customer's account information.
- Since the Company has not established passwords for customers, the following guidelines are followed for customers wanting to discuss call-detail information:
 - If the customer can provide all of the call detail information (telephone number called, date of call, amount of call, etc.) necessary to address the customer's issue, the Company will continue with its routine customer care procedures.
 - If the customer cannot provide all of the call detail information to address the customer's issue, the Company will: (1) call the customer back at the telephone number of record, (2) send the information to the address of record, or (3) ask the customer to come into the office and provide a valid photo ID.
- The Company has a disciplinary process in place for any improper use of CPNI. The disciplinary action is based on the type and severity of the violation and could include any or a combination of the following: retraining the employee on CPNI rules, notation in the employee's personnel file, formal written reprimand, suspension or termination. The disciplinary process is reviewed with all employees on an annual basis.
- The Company has not asked customers for approval to use CPNI because, currently, it only uses CPNI in those instances where it is permissible to use CPNI without customer approval. For marketing purposes, the Company does mass marketing to all customers, or uses CPNI to market only service offerings among the categories of service to which the customer already subscribes. If in the future, the Company wants to do selective marketing using CPNI, it will ask customers for approval to use their CPNI according to the guidelines in the CPNI rules.
- The Company does not share CPNI with any third parties, unless required by law enforcement.

- The Company does not currently conduct any marketing campaigns using CPNI. If, in the future, the Company decides to have a marketing campaign that uses CPNI, it will establish a supervisory review process and a process for maintaining a record of the campaign before any campaign is conducted.
- The Company promptly notifies customers whenever a change is made to their address. This notification is sent to the customer's "address of record" that has been associated with the account for at least 30 days.
- Employees are instructed to notify the Compliance Officer immediately of any indication of a breach. If the Compliance Officer determines there was a breach, he will notify the USSS and FBI according to the requirements detailed in § 64.2011. The breach will be documented in the annual certification to the FCC.
- Following is the minimum retention period the Company has established:
 - Annual certification – 5 years
 - Annual employee training certification – 2 years
 - Breaches – 2 years
 - All other information regarding CPNI – 2 years
- The Company's CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.