Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 3/1/2018

2. Name of company(s) covered by this certification: Moapa Valley Telephone Company

3. Form 499 Filer ID: 804657

4. Name of signatory: Bradley C. Lyon

5. Title of signatory: President

6. Certification:

I, Bradley C. Lyon, 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.*
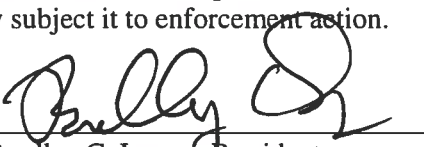
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 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 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 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 _____
Bradley C. Lyon – President

Attachments: Accompanying Statement explaining CPNI procedures

Moapa Valley Telephone Company ("MVT") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- MVT has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

- MVT continually educates and trains its employees regarding the appropriate use of CPNI. MVT has established disciplinary procedures should an employee violate the CPNI procedures established by MVT.

- MVT maintains a record of its sales and marketing campaigns. **MVT does not use customer's CPNI for marketing purposes.**

- MVT has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, MVT's sales persomlel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

- MVT took the following actions against data brokers in 2017, including proceedings instituted or petitions filed by MVT at a state commission, in the court system, or at the Federal Communications Commission: **There were no data broker incidents in 2017.**

- The following is information MVT has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: **MVT used a variety of methods to authenticate customers prior to disclosing CPNI when discussing Call Detail Records with the customer of record. MVT does not use CPNI for marketing purposes.**

- The following is a summary of all customer complaints received in 2017 regarding the unauthorized release of CPNI:

  - Number of customer complaints MVT received in 2017 related to unauthorized access to CPNI: **None**

  - Category of complaint:

    - Number of instances of improper access by employees: **None**

    - Number of instances of improper access to online information by individuals not authorized to view the information: **None**

    - Number of instances of improper access to online information by individuals not authorized to view the information: **None**

    - Number of other instances of improper access or disclosure: **None**

  - Description of instances of improper access or disclosure: **None**