**ANNUAL 47 C.F.R. § 64.2009 (e) CPNI CERTIFICATION**

**STATEMENT OF FCC CPNI RULE COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009 (e) CPNI Certification for January 1, 2017 – December 31, 2017

Date Filed: March 1, 2018

Company: City of Burlington d/b/a Burlington Telecom

Form 499 Filer ID: 824302

Name of Signatory: Stacey Trudo

Title of Signatory: Division Residential Sales and Customer Service Manager

This statement serves to explain how Burlington Telecom (“the Company”) is complying with the 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 telecommunications company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 6 4.2001 et seq.).

**As of this date, the company has not used nor plans to use CPNI for marketing. For marking purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.**

1. **Identification of CPNI**

The Company has informed employees having access to, or occasion to use customer data, to identify what customer information for CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(g) of the FCC’s Part 64, Subpart U.

1. **Customer Notification and Authorization Process**

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company has established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC’s Part 64, Subpart U CPNI rules. In the event the Company undertakes to use CPNI for marketing and provides written notification, the Company’s notification will comply with the requirements of Section 64.2008.

1. **Disciplinary Process**

In compliance with Section 64.2009 (b) of the FCC’s Part 64, Subpart U CPNI rules, the Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC’s CPNI rules.

1. **Record Safeguards**

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009 © of the FCC’s Part 64, Subpart U CPNI rules.

1. **Supervisory Review Process for Outbound Marketing**

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009 (d) for the FCC’s Part 64, Subpart U CPNI rules.