

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for: **2018**

Date filed: **March 1, 2019**

Name of company covered by this certification: **New Hope Telephone Cooperative**

Form 499 Filer ID: **805731**

Name of signatory: **Timothy M. Harris**

Title of signatory: **Executive Vice President**

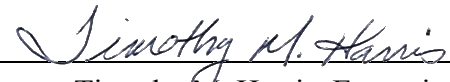
I, **Timothy M. Harris**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken any actions (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 2018 or related to 2018. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company **has not** received any customer complaints in 2018 concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47CFR § 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   
Timothy M. Harris, Executive Vice President

**Attachments:** Accompanying Statement explaining CPNI procedures

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## **New Hope Telephone Cooperative CPNI Compliance Procedures Statement**

### **CPNI Manual**

New Hope Telephone Cooperative has a CPNI manual that thoroughly explains all aspects of CPNI, including (but not limited to):

- CPNI definition
- When and how CPNI can be used
- What is and is not considered CPNI
- Examples of appropriate use
- Using CPNI for marketing purposes
- Definition and explanation of Opt-in approval
- Definition and explanation of Opt-out approval
- Definition and explanation of “One-time use of CPNI” for individual phone calls
- Proper use of CPNI for New Hope Telephone Cooperative marketing campaigns
- Proper use, disclosure and access to CPNI to Third-parties and/or Third-party marketing campaigns
- Customer notification requirements
- Record keeping requirements
- FCC certification requirements
- Disciplinary procedures

The CPNI manual also includes copies of Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222 and Part 64 – Subpart U, 47 C.F.R. § 64.2007 – 64.2011.

### **CPNI Compliance Officer**

The Executive Vice-President of New Hope Telephone Cooperative serves as the agent of the carrier, to sign and file with the Commission its compliance certificate. This officer is responsible for a thorough knowledge of FCC rules and requirements regarding CPNI, including (but not limited to): its accepted use, record keeping, and notification requirements. The CPNI Compliance Officer also coordinates and supervises employee and agent CPNI training. All questions, issues, concerns and disciplinary procedures are handled through the CPNI Compliance Officer.

### **Training**

All employees are thoroughly trained on the use of CPNI and each employee receives a copy of the New Hope Telephone Cooperative CPNI manual.

**Customer CPNI choice**

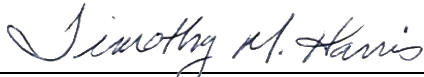
Each customer's account is clearly labeled as to their choice about the usage of their CPNI.

**Account Change Notification**

New Hope Telephone Cooperative sends notification to the customer's address of record, via postal mail, whenever there has been:

- An address of record change.
- Customer password change.
- Change of customer response to a back-up means of authentication for lost or forgotten passwords.
- Online account change.

The notification does not include the specific account change.



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Timothy M. Harris, Executive Vice President

March 1, 2019

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Date