

March 1, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W., Suite TW-A325
Washington, DC 20554

**RE: Annual CPNI Certification and Accompanying Statement of High Plains
Telecommunications, Inc. (FCC Form 499 Filer ID: 814775), EB Docket No.
06-36**

Dear Ms. Dortch,

High Plains Telecommunications, Inc., by its attorney and pursuant to Section 64.2009(e) of the Federal Communications Commission's rules, hereby submits its annual Customer Proprietary Network Information certification and accompanying statement. This certification for 2019 covers prior calendar year 2018.

Should you have any questions, please contact the undersigned.

Respectfully submitted,

By: /s/ Anthony K. Veach

Anthony K. Veach
202.631.9190
Counsel for High Plains Telecommunications, Inc.

Attachments

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) Customer Proprietary Network Information (“CPNI”) Certification for 2019 covering the prior calendar year 2018

1. Date Filed: March 1, 2019

2. Name of Company Covered by This Certification: High Plains Telecommunications, Inc.

3. Company’s FCC Form 499 Filer ID: 814775

4. Name of Signatory: Catherine Moyer

5. Title of Signatory: Chief Executive Officer


6. Certification: I, Catherine Moyer, certify that I am an officer of High Plains Telecommunications, Inc. (the “Company”), 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 Federal Communications Commission’s (the “Commission”) 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 Subpart U of Part 64 of the Commission’s rules.

The Company has not any taken actions (*i.e.*, proceedings instituted or petitions filed at either state commissions, the court system, or the Commission against data brokers) against data brokers in the past year.

The Company has not received any 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  as agent of the Company

Attachment: accompanying statement explaining the Company’s CPNI procedures and policy

Company CPNI Operating Procedures and Policy

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("Commission") rules, this statement explains how High Plains Telecommunications, Inc.'s (the "Company") operating procedures ensure compliance with Subpart U of Part 64 of the Commission's rules (47 C.F.R. § 64.2001 *et seq.*).

Company has established operating procedures that ensure compliance with the Commission's regulations regarding the protection of customer proprietary network information ("CPNI"). Company has adopted a CPNI manual and updates it with CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation. Company educates and trains its employees as to when they are and are not authorized to use CPNI, as well as appropriate use of CPNI when authorized. Company has established a disciplinary process should an employee violate the CPNI procedures established by Company, which includes termination of employment.

Company has implemented a system whereby the status of a customer's CPNI approval can be clearly determined prior to the use of CPNI. Company maintains a record of its and its affiliates' sales and marketing campaigns that use customer CPNI. Company also maintains a record of any and all instances where CPNI were disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records, which are retained for a minimum of one year, include a description of each sales and marketing campaign, the specific CPNI that were used in each campaign, and what products and services were offered as a part of each campaign.

Company has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of compliance for a minimum period of one year. Company's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval. With respect to the use of an opt-out approval process for utilizing customer CPNI to market communications-related services, Company provides written notice, within five business days, to the Commission of any instance where opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly.

Company has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Company's retail locations, electronically, or otherwise. In connection with these procedures, Company has established a system of personal identification numbers, passwords, and back-up authentication methods for all customers and accounts, in compliance with the requirements of applicable Commission CPNI rules. Company has established procedures to ensure that customers are notified of account changes, including changes to passwords, back-up means of authentication for lost or forgotten passwords, or addresses of record.

In the event of unauthorized disclosure of CPNI, Company complies with the Commission's rules regarding notice to law enforcement and customers. Company maintains records, for a period of at least two years, of any discovered CPNI breaches, notifications to the United States Secret Service, the Federal Bureau of Investigation, and customers regarding those breaches, as well as responses to such notifications.