



VIA ELECTRONIC FILING

March 1, 2019

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Certification of CPNI Compliance, EB Docket No. 06-36  
Granite Telecommunications, LLC – 499 Filer ID#822170

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures for Granite Telecommunications, LLC. Please contact me with any questions regarding this filing.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Sana Sheikh', with a long, flowing horizontal stroke extending to the right.

Sana Sheikh, Esq.  
Senior Corporate Counsel  
Granite Telecommunications, LLC  
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**Annual 47 C.F.R. § 64.2010(e) CPNI Certification**  
**EB Docket 06-36**

1. **Date Filed:** March 1, 2019
2. **Name of Company:** Granite Telecommunications, LLC
3. **Form 499 Filer ID:** 822170
4. **Name of Signatory:** Rand Currier
5. **Title of Signatory:** Chief Operating Officer
6. **Certification:**

I, Rand Currier, 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 systems, or at the Commission) against data brokers in the past year.

The company 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 be subject to enforcement action.

Signed: \_\_\_\_\_  
Name: Rand Currier  
Title: COO

Attachment: Accompanying Statement explaining Company Procedures



### **Attachment 1: Statement Concerning Company Procedures**

Granite Telecommunications, LLC ("Granite") has established strict policies and procedures which ensure that its operating procedures are in compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules. Granite prohibits release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. Employees that have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI is accessible only to those employees with a "need to know" for purposes of serving current subscribers. All contact with customers is documented through retention of electronic and / or hard copies of communications (including retention of any scripts if contacting subscribers telephonically) for a minimum period of one (1) year. All sales or marketing campaigns initiated by Granite require approval of the officer responsible for ensuring that each campaign complies with the Commission's CPNI regulations.

Consistent with the Commission's CPNI rules, Granite's employees are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities outside the company, except as follows:

- 1) Granite may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Such a request must include the following: (i) the request must be made in writing; (ii) the request must include the customer's correct billing name, address and telephone number; (iii) the request must specify what types of CPNI can be disclosed or provided; (iv) the request must specify the time period for which the CPNI may be disclosed or provided, and (v) the request must be signed by the customer.
- 2) Granite may provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.
- 3) Granite may use, disclose or permit access to CPNI to provide or market the same category of telecommunications service to a customer from which the CPNI is derived. For example, Granite may use the CPNI from our provision of local service to a customer to provide or market new, additional or modified local service offerings to the customer.
- 4) Granite may use, disclose, or permit access to CPNI to provide services necessary to, or used in, the provision of telecommunications services from which the CPNI is derived.
- 5) Granite may use CPNI to initiate, render, bill and collect for telecommunications service.



- 6) Granite may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of the telecommunications services from which the CPNI is derived.
- 7) When an existing customer calls Granite to inquire about or order new, additional or modified services (i.e., in-bound marketing) Granite may use the customer's CPNI to assist the customer for the duration of the customer's call provided Granite provides the customer with the oral notice required by §§ 64.2008(c) and (f) of the Commission's CPNI rules.
- 8) Granite has adopted a policy that it does not and will not use, disclose or permit access to CPNI in connection with company-initiated marketing of services outside the bucket of services to which a customer already subscribes (i.e., out-bound marketing).