

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

Annual Section 64.2009(e) CPNI Certification for 2018, covering prior year 2017

Date Filed: February 28, 2018

Name of companies covered by this certification: Kit Carson Electric Cooperative, Inc., Kit Carson Telecom (a division of Kit Carson Electric Cooperative, Inc.)

499 Filer ID No.: 830493

Name and Title of Signatory: Andrew Gonzales, Telecommunications Manager

I, Andrew Gonzales, certify that I am an officer of Kit Carson Electric Cooperative, Inc. (the "Company"), and acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 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 did not take any actions (proceedings instituted or petitions filed by a company at state commissions, in the court system or at the Commission) against data brokers in 2017. The company did not receive any customer complaints during 2017 concerning the unauthorized release of CPNI. The Company does not have any information outside of the information that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

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:

  
Andrew Gonzales, Telecommunications Manager

Date:

February 28, 2018

Attachment: Accompanying Statement Explaining CPNI Procedures

**Kit Carson Electric Cooperative, Inc.**

**Statement Regarding Customer Proprietary Network Information Operating Procedures**

Kit Carson Electric Cooperative, Inc. ("KCEC"), in accordance with Section 64.2009(e) of the Commission's rules, submits this statement summarizing how the KCEC's operating procedures are designed to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules.

KCEC provides interconnected Voice over Internet Protocol ("VoIP") services to schools and libraries, as well as Internet access services.

KCEC values its customers' privacy and takes measures to protect CPNI. KCEC does not use, disclose or permit access to its customers' CPNI except as permitted by Section 222 of the Communications Act of 1934, as amended, and the Commission's implementing rules.

As necessary, KCEC may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing and collecting for telecommunications services. KCEC may also use CPNI to protect its rights or property.

KCEC has in place a process for verifying its customers' identity during an inbound call. Except for business customers who have specifically authorized release of CPNI pursuant to a procedure established by contract, KCEC does not release call detail information during an inbound call. KCEC also requires customers to establish a password to be used to authenticate the customer's identity in order to access account information.

KCEC trains its personnel in the use of CPNI. KCEC has an express disciplinary process in place for violations of KCEC's CPNI policies.

KCEC does not use CPNI to market products or services to customers outside of the category of service to which the customer already subscribes. KCEC does not share CPNI with affiliates or third parties for marketing purposes. If, in the future, KCEC seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. KCEC also will maintain a record of any marketing campaign in accordance with the Commission's rules.

KCEC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. KCEC has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach which results in the unauthorized access to, use or disclosure of CPNI. KCEC will maintain a record of the notification in accordance with the Commission's rules.

KCEC has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.