PemTel
Neighbors Serving Neighbors

504 Snidow St. P.O. Box 549
Pembroke, VA 24136

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February 22, 2016

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

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RE: **EB Docket No. 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2016
Pembroke Telephone Cooperative
Form 499 Filer ID 809804

Dear Ms. Dortch:

On behalf of Pembroke Telephone Cooperative, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification with accompanying statement covering calendar year 2016.

Should any questions arise regarding this submission, please contact our office.

Sincerely,

Jill Williams

Jill Williams
Office Manager

Enclosures
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PEMBROKE TELEPHONE COOPERATIVE
Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2016

Date Filed: February 28, 2017

Name of Company covered by this certification: Pembroke Telephone Cooperative

Form 499 Filer ID: 809804

Address: P.O. Box 549
Pembroke, VA 24136

Name of signatory: Leon A. Law

Title of signatory: President

CERTIFICATION

I, Leon A. Law, 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 Customer Proprietary Network Information rules set forth in 47 C.F.R. § 64.2001 *et seq.* of the rules of the Federal Communications Commission.

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, recordkeeping, and supervisory review) 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 the past year.

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

Pembroke Telephone Cooperative
Annual 47 C.F.R. § 64.2009 (e) CPNI Certification for
Year 2017 covering the prior calendar year 2016

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 Leon A. Law

Name: Leon A. Law
Title: President
Date: 2/28/2017

Attachment: Accompanying Statement explaining CPNI procedures

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PEMBROKE TELEPHONE COOPERATIVE

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Pembroke Telephone Cooperative (the Company) is complying with 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 telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2001-2009).

1. Integrated Nature of CPNI Practices

The Company is a family of affiliated companies providing telecommunications services. FCC rules require that the Company has separate affiliates for some services, but allows those separate affiliates to have common employees. Pembroke Telephone Cooperative is made up of the incumbent local exchange company with long distance service, a subsidiary and Internet group. Customers may not always be aware that different, individual affiliates of the Company provide them with specific telecommunications services. The Company's affiliates include the following companies:

Giles-Craig Communications, Inc

No matter which of the Company's affiliates provides a service, the employees of a single affiliate may provide customer service and support to the customers of the other affiliates. In other cases, employees may be dedicated to a single Company affiliate but still rely on operational support systems common to all of the Company's affiliates. Thus, the Company's practices for complying with the FCC's CPNI rules are on an integrated Company basis. References to "employees" in this document refer to employees of the Company as a whole.

2. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by the Company's CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the Company's CPNI Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

3. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI. These services are:

Telecommunications Services:

Local (ILEC)
Interexchange (long distance)

Non-telecommunications Services

Internet
Voice Mail
Inside Wiring
CPE (Customer Premise Equipment)

4. Use of CPNI Is Restricted

The Company recognizes that CPNI includes information that is personal and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of Company employees and agents who use or have access to CPNI; and (3) receiving, reviewing and resolving any questions or issues arising within the Company regarding use, disclosure, or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

5. Permissible Uses of CPNI

Company employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the Company, except as follows:

1. The Company 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.

2. In the absence of an appropriate written request from the customer, the Company may provide the customer's phone records or other CPNI to a law enforcement agency only in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. The Company may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, the Company may use the CPNI from its provision of local exchange service to a customer to provide or market new, additional or modified local exchange service offerings to the customer. Likewise, the Company may use the CPNI from its provision of long distance toll service to a customer to provide or market new, additional or modified long distance toll service offerings to the customer.

4. The Company and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

a. The FCC has noted the publishing of directories as an example of this permitted use.

b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services.

c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by the Company's CPNI Compliance Officer.

5. The Company, its authorized employees and its billing agent may use CPNI to initiate, render, bill and collect for telecommunications services.

6. The Company may use CPNI to protect the Company's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. The Company may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without the customer's approval, to provide customer premises equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

8. If a customer subscribes to more than one category of service offered by the Company, the Company is permitted to share CPNI among its affiliated entities that provide a service offering to the customer.

If a customer does not subscribe to more than one offering by the Company, the Company is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth.

9. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice guided by Sections 64.2008(c) and 64.2008(f) of the FCC's Rules.

6. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008.

7. Training

The Company has trained existing employees having access to, or occasion to use CPNI, as to when they are and are not authorized to use CPNI. For new employees having access to, or occasion to use CPNI, the Company will include such training as part of employee orientation and training.

8. Disciplinary Process

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 Part 64, Subpart U CPNI rules.

9. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

2/27/17
Date

Lisa W. Epperley, General Manager

2-27-17
Date

Leon A. Law, President

2/27/17
Date

David G. Yolton, President of Giles-Craig Communications, Inc., subsidiary of Pembroke Telephone Cooperative