

**BUGGS ISLAND TELEPHONE COOPERATIVE**  
**100 Nellie Jones Road P.O. Box 129, Bracey, VA 23919**

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date signed: May 3, 2019

Names of Company Covered by this Certification:

499 Filer ID

Buggs Island Telephone Cooperative

801312

Name of signatory: Michele Taylor

Title of signatory: General Manager

I, Michele Taylor, 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 (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 system, or at the Commission against data brokers) against data brokers in the past year.

The company has 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 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: Michele Taylor

**BUGGS ISLAND TELEPHONE COOPERATIVE**  
**100 Nellie Jones Road P.O. Box 129, Bracey, VA 23919**

**499 Filer ID 801312**

**2018 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**May 3, 2019**

This statement serves to explain how Buggs Island Telephone Cooperative ("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. §§ 64.2000-2011).

*All subsequent references to rule sections refer to rules under Part 64, Subpart U unless otherwise indicated.*

**1. Uses of CPNI for Marketing**

The Company limits use of CPNI for marketing to the following:

- a. Pursuant to Sections 64.2007(a) and 64.2008(f), the Company uses CPNI, subject to customer authorization, for one-time use during in-bound calls from customers.
- b. Pursuant to Section 64.2005(a), the Company uses CPNI from a category of telecommunications service (local, interexchange or wireless) for marketing limited to use for marketing services in the same category of service from which the CPNI is derived or to another category of telecommunications service to which the customer also subscribes.

**2. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**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.

**4. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**5. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.



**6. Customer One-Time Notification and Authorization Process**

The Company has developed procedures for one-time oral notification of customers making inbound calls regarding CPNI pursuant to the requirements of Section 64.2007 generally and Section 64.2007 generally and Section 64.2007(f) specifically.

**7. Record of Customer CPNI Approval/Non-Approval**

At such time as Company may initiate use of CPNI for outbound marketing of services outside a category currently provided to a customer, with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**8. Procedures Protecting Against Disclosure of CPNI**

The Company in place procedures for compliance with Section 64.2010 including, but not limited to the following:\*

procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits;

procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

\*The Company does not provide on-line access to customer account information.

**9. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.

No customer complaints received.

**10. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**11. Supervisory Review Process for Outbound Marketing**

The Company has a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules as well as related record-keeping pursuant to Section 64.2009(c).

**12. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related record-keeping and deferred notification to customers.