



MID CENTURY TELEPHONE COOPERATIVE™

285 Mid Century Lane • PO Box 380 • Fairview, IL 61432

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2015** covering the prior calendar year **2014**

Date filed: **January 30, 2015**

Name of company covered by this certification: **Mid Century Telephone Cooperative**

Form 499 Filer ID: **808473**

Name of signatory: **James W. Broemmer**

Title of signatory: **CEO**

I, **James W. Broemmer**, certify that I am an officer of the company named above, and acting as 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 Mid Century Telephone 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.

Mid Century Telephone 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.

Mid Century Telephone has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Mid Century 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:


James W. Broemmer / CEO

Attachment: Accompanying Statement explaining CPNI procedures



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January 30, 2015

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

**Re: Certification of Annual 47 C.F.R. § 64.2009(e) CPNI Filing, EB Docket 06-36
Mid Century Telephone Cooperative, March 2, 2015**

Dear Ms. Dortch:

Attached please find Mid Century Telephone Cooperative's Certification of CPNI Filing and the accompanying descriptive statement of how Mid Century's CPNI procedures and actions ensure that Mid Century is in compliance as required by Section 64.2009 of the Commission's Rules.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'James W. Broemmer', is written over a horizontal line.

James W. Broemmer
CEO

Attachments

cc: Best Copy and Printing, Inc.

**Customer Proprietary Network Information (CPNI)
 Statement of CPNI Compliance
 Annual 47 C.F.R. §64.2009(e) CPNI Certification
 EB Docket No. 06-36**

**Annual Certification Processes Summary
 Certification for 2015 covering the prior calendar year 2014**

The Statements below describe the procedures and actions taken to ensure that Mid Century is in compliance with the FCC's CPNI Rules.

A. Employee CPNI Training	Mid Century (MCTC) continues to be proactive in ensuring its employees are properly updated and trained in procedures related to CPNI. Employees are trained annually, at a minimum. Training includes, but is not limited to, examples of when employees are and are not authorized to use CPNI. Focus of CPNI also extends in to Mid Century's Red Flag Identity Theft Prevention Program. Employee training is documented and properly retained.
B. Disciplinary – Improper Disclosure of CPNI	MCTC's CPNI policy includes an express disciplinary process for employee infractions. There were no CPNI employee infractions for 2014.
*C. Process for Opt-in and Opt-out	MCTC markets to its customers using the Opt-out approach, when applicable. MCTC does not participate in 3 rd party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, MCTC notifies its customers every two years of a customer's Opt-out rights and methods to Opt-out. Mid Century's next scheduled Opt-out notification is December 2015. There were no applicable sales or marketing campaigns requiring prior Opt-out notification for year 2014. Occasionally, a MCTC or Century Enterprises, Inc. (CEI) - MCTC's long distance subsidiary - representative may ask the customer for oral consent to use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone services to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services. Detailed comments are noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.
D. Actions taken against data brokers (Pretexters)	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2014.

E. Pretexters process(es) – attempt to access CPNI	No known access to CPNI by Pretexters (breaches) was reported for the year 2014.
F. Customer Complaints – Unauthorized release of CPNI	No customer complaints were received as a result of unauthorized release of CPNI for the year 2014.
G. Process to ensure Opt-out elections are recorded & followed	<p>Customers may call our business office or our after-hours support, come in to one of our business office locations, e-mail us, respond to our annual Opt-out customer notification, or utilize the Opt-out form on our website in order to deny or approve our use of their CPNI to offer products or services not related to the telephone services to which the customer currently subscribes. Service order processing and Customer Service Representative procedures are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or unrestrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.</p>
H. Other CPNI Compliance measures	<p>Access to customer CPNI is limited to authorized personnel and restriction pass codes are used to facilitate safeguard assurance. Release of call detail information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis.</p> <p>Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.</p>

*Mid Century will honor any customer CPNI elections it receives by recording the restriction or non-restriction to the company and to its affiliate companies, Century Enterprises, Inc. and CenComm, Inc., customer account record.

Form 499 Filer ID: 808473

Date Filed: January 30, 2015

Signed: By:


James W. Broemmer / CEO