KINGDOM

telephone company

February 11, 2015

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

RE: EB Docket No. 06-36
Certification of CPNI Filing

Dear Ms. Dortch:

Please find enclosed our certification certificates and respective operating procedures related to rules regulating any use of "customer proprietary network information" by Kingdom Telephone Company d/b/a Kingdom Long Distance staff members.

If you have questions about this certification, please bring those questions to my attention.

Sincerely,

Marla McCowan

Marla K. McCowan
Asst. Board Secretary

Enclosures

211 South Main Street
P.O. Box 97
Auxvasse, MO, 65231
Local: 573-386-2241
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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: February 11, 2015

Name of company covered by this certification: Kingdom Telephone Company d/b/a Kingdom Long Distance

Form 499 Filer ID: 801294

Name of signatory: Marla K. McCowan

Title of signatory: Assistant Secretary of the Board of Directors

I, Marla K. McCowan, certify that I am an officer of the company 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 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (the number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized discloser of CPNI, broken down by category or complaint, *e.g.,* instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

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.

Marla McCowan

Signed

Subscribed and sworn to before me this 11th day of February, 2015.

Paula Barnett

Notary Public

My Commission expires:

PAULA BARNETT
Notary Public - Notary Seal
State of Missouri
Commissioned for Audrain County
My Commission Expires: December 15, 2018
Commission Number: 14425927

Statement of Explanation: CPNI Compliance

This accompanying statement explains how Kingdom Telephone Company d/b/a Kingdom Long Distance's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Kingdom adheres to all CPNI rules as stated in Section 64.2001-64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- the training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
- the implementation of an express disciplinary process for CPNI violations;
- the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules.

A copy of the subpart cited above is attached to this statement of explanation.

Certificate of Compliance: Customer Proprietary Network Information (CPNI)
RE: EB-06-TC-060 Certification of CPNI Filing

This certifies that the undersigned, as a corporate officer of Kingdom Telephone Company d/b/a Kingdom Long Distance, has personal knowledge that Kingdom Long Distance has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations.

Mark McCore
Signature

Title: Asst. Board Secretary

Date: February 11, 2015

CUSTOMER PROPRIETARY NETWORK INFORMATION

Protecting the privacy of your service and usage records is your right and our duty under federal law. Kingdom Telephone Company, along with Kingdom Long Distance and other affiliates, are required to inform you that you can direct us not to use any of the information about the services you have purchased from Kingdom to offer you additional products and services. If you do not want us to use any of your service and usage information to offer you products and services, please call 1-800-487-4811 and have one of our customer service representatives note that on your records. There is no charge for electing to restrict your information. Proof of that election will be shown on your monthly bill as "Restricted CPNI".

If you do not restrict our use of your customer information by calling 1-800-487-4811, Kingdom can use your customer information to offer you products and services that you may find valuable based on your existing services.

Again, no action on your part is necessary unless you wish to restrict Kingdom Telephone and its affiliates' from using your information for the purpose of tailoring our service offerings to your individual needs. Restricting your information will not affect the services you currently have with Kingdom and your election is valid until you affirmatively revoke or limit it.

UNDER NO CIRCUMSTANCES WILL KINGDOM SHARE THIS INFORMATION WITH ANOTHER PARTY, NOT AFFILIATED WITH KINGDOM, REGARDLESS OF WHETHER YOU RESTRICT KINGDOM'S USE OR NOT.

KINGDOM TELEPHONE COMPANY d/b/a KINGDOM LONG DISTANCE
Policy on Customer Proprietary Network Information (CPNI)
Written Policy Date: August, 2002
w/Revisions: May 2004 – Nov 2004 – April 2007 – January 2008

The explanation and policy below is meant to set rules for all employees of Kingdom Telephone Company d/b/a Kingdom Long Distance on the use of CPNI. There will be no use of CPNI for any marketing purposes by any employee(s) of the company without following the guidelines set forth below. Failure to follow these guidelines will result in disciplinary action taken against any violator of this policy.

APPLICABLE RULES – FCC Section 222(f) – MoPSC 4 CSR 240-33.160

According to FCC and MoPSC regulations, *"a telecommunications carrier may not use, disclose, or permit access to CPNI to market to a customer, service offerings that are within a category of service to which the customer* ***does not already subscribe*** *to from that carrier, unless the carrier has customer approval to do so…"*

WHAT IS CPNI?

Regulations of the FCC & MoPSC state that CPNI means:

A. Information that relates to the quantity, technical configuration, type, destination and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier and that is made available to the carrier by the customer solely by the virtue of the carrier-customer relationship.
B. Information contained in the bills pertaining to telephone exchange or toll service received by a customer of a carrier; except that such term does not include subscriber list information.

In practical terms, CPNI is private information held only by Kingdom through its business relationship with the customer that reveals:

A. Where, when and to whom they call
B. Amount and length of calls they make
C. Services they subscribe to (calling features, etc.)
D. Who their provider is for a given service

WHAT IS NOT CPNI?

A. Published directory information such as a customer's name, address, and telephone number
B. Information that is available in the public domain or from any other, non-company source
C. Information you gather from customers in ways other than through the provision of service
D. Information derived from sales of CPE or information services
E. Customer credit information
F. Products on bill that are not telecommunications services

BEFORE RELEASING ANY CPNI INFORMATION THE FOLLOWING SAFEGUARDS ARE REQUIRED BY THE FCC – Amended April 2007

The FCC has strengthened its CPNI rules to guard against "pretexting" (pretending to be a customer or authorized person in order to access call detail or other private information) by the following to protect our customers against unauthorized access and disclosure of their information.

A. The following rules are established for customer calls, online account access, and in-office contacts:

- We are prohibited from releasing call detail information during customer-initiated calls except under the following circumstances.
  - Customer provides a pre-established password
  - CPNI is mailed to the address of record
  - We call customer at the telephone number of record
  - **EXCEPT** - If our customer provides all the call detail information needed to address an issue, without our assistance, we can discuss that call without violating CPNI rules.
- Password Creation (This info resides in "Free Flow Comments")
  - We must establish a password when service is initiated. This should include a backup password process for when the password of record is forgotten. The backup password is a "shared secret of one or more question-answer combinations that are known to the customer and the carrier but are not widely known. **It is otherwise illegal** for Kingdom employees to assist the customer with their password by prompting them in any way.
  - For existing customers, we can only establish a password by contacting the customer at their telephone number. We **CANNOT** authenticate a customer to create passwords by using available biographical information or account information when they call our office.
  - For a customer that comes to the office we can verify their right to CPNI by checking a valid photo ID.
- Alternative Customer Access Without Password
  - We can send the customer the call detail information and other CPNI to their mailing address of record
  - We can call the telephone number of record
- Online Access
  - We are required to provide mandatory password protection for online account access
  - We are prohibited from relying on readily available account or biographical information to authenticate a customer's identity before a customer accesses CPNI online
  - Must authenticate both existing and new customers seeking online access. We do not have to reinitialize existing online passwords
  - *For customers seeking assistance with their on-line account, we can communicate with them via email at their ktis.net account if no prior "customer service password" for authentication has been established. The customer could reply to our email with a password that then could be used for assisting that customer.*

B. When there are customer account changes verbally through our office we must notify our customer immediately if the following information is changed.

- Password
- Customer back-up means for lost or forgotten password
- Online account
- Address of record

C. In case of an unauthorized disclosure of CPNI:

- A log must be kept by the senior CSR, on a calendar year basis, that shows all customer complaints of unauthorized release of CPNI received in the period. If a breach is discovered the retained records must include the date the U.S. Secret Service (USSS) and the FBI were notified, a detailed description of the CPNI that was breached, and the circumstances of the breach. Retain this log for at least 2 years.
- A notification to law enforcement must happen within seven (7) days of the breach. This notification can be accomplished via the FCC link at www.fcc.gov/eb/cpni
- Customers must also be notified within seven (7) days UNLESS the USSS or the FBI request that notification be held for up to thirty(30) days in writing. They may also request additional thirty(30) day extensions in writing.

OVERVIEW OF CPNI RULES

A. Kingdom Long Distance is permitted to use CPNI, ***without customer approval***, to market offerings that are related to, but limited by, the ***customer's existing service*** relationship. Those relationships would be:

- Telecommunications Services
  - Local Service
  - KLD
  - Inside Wiring
- Non-telecommunications Services
  - Information Services
  - Internet Access

Basically, you can use CPNI for the following without special customer permission.

- Non-marketing purposes including:
  - Initiation and billing of service
  - Protection against fraud
  - Network Planning
  - Normal customer service calls (billing, etc.)
- Marketing CPE and Information Services, except directed marketing of KTIS Internet for KTC customers
- Marketing inside wiring installation, maintenance and repair
- To win back customers who switched to another carrier from KTC/KLD
- Marketing of services within categories in which customer already is a subscriber

B. Before Kingdom Long Distance may use CPNI to market *outside the customer's existing service relationship*, we must give our customers' the opportunity to opt-out of having Kingdom market those services to them. *We have done the opt-out campaign during April 2003 and January 2008 via customer mass mailings and received oral orders from customers. New customers are advised of their privacy rights related to CPNI upon establishing service*. Additionally, opt-out notices will be mailed out every two years to all customers. (All written notification must use at least a 10 point font.) Active customers, choosing to opt-out of any CPNI marketing, have had their customer file updated to include a USOC establishing their account as a **"Restricted CPNI"** customer account.

Kingdom Long Distance will provide written notification to the PSC within five (5) business days of any instance where the opt-out mechanisms do not work properly, to such a degree that the customers' inability to opt-out is more than an anomaly.

For CPNI disclosure to unrelated third parties or to any Kingdom affiliate, a customer must "opt-in" to allow that information to be provided. **THIS WILL NOT BE DONE WITHOUT MANAGEMENT'S APPROVAL OF SUCH A DISCLOSURE**.

C. The FCC & MoPSC have implemented certain safeguards to protect CPNI from unauthorized distribution or access. Kingdom Long Distance is adopting these safeguards as a part of its CPNI policy.

- Approval Tracking
  Kingdom will retain customer's CPNI opt-out directives by posting those on the customer's account as "Restricted CPNI". All documents related to any marketing campaign using CPNI, will be filed in the CPNI Folder in the Administrative Assistant's file system for no less than one year.
- Employee Training
  - All employees with access to customer records will know rules applying to CPNI
  - What is CPNI
  - When they can use CPNI and when they cannot use CPNI
  - Any violation of this policy will result in immediate termination
- Compliance Certificate
  - Annual, signed by corporate officer, and due the FCC and the MO PSC by March 1st.
  - Certification must include an accompanying statement explaining how Kingdom's operating procedures ensure compliance with the rules, a detailed explanation of any actions taken against data brokers (if any), and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.
  - Certification will include a statement that Kingdom's operating procedures are in compliance with the CPNI rules and include an accompanying statement that details how the carrier's procedures are not in compliance if applicable.
  - This certification will be available to public
- Supervisory Review
  Marketing campaigns, using CPNI, must be approved in advance by the General Manager. All records for outbound marketing situations must be retained for a minimum of one year. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services offered as part of the campaign.

SUMMARY OF CPNI IMPACT

Impact on Marketing and Customer Service

Kingdom Long Distance will experience very little impact since we have no plans to use CPNI in our marketing efforts. We will continue to market/advertise to **all** versus only select, targeted customers.

We would be in violation of CPNI rules if we began a new "out of category" services marketing campaign that used best/most logical customer targeting strategies. For example, we could not target MCI WorldCom customers without our joint customer's prior knowledge of CPNI rules and the opportunity to opt-out.

Kingdom maintains a record, electronically or in some other manner, of its own, its agents', its affiliates', its joint venture partners' or its independent contractors' sales and marketing campaigns that use CPNI. These records include any instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. Records include a description of each campaign, the specific CPNI that was used in the campaign, and what products or services were offered as a part of the campaign. Such records are retained for all current and former customers for a minimum of one (1) year.

One-time use approvals

On an inbound (after proper authentication) or normal course of business outbound call, you can look at CPNI and market new services to a customer *if you receive oral approval to do so before marketing the service and their file does not indicate "Restricted CPNI"*.

If we were to do a targeted telephone marketing campaign, our responsibility as part of the approval process should be:

- Must state that the customer has a right, and that Kingdom has a duty, under federal law, to protect the confidentiality of their CPNI. (NOTE: If they want to restrict CPNI, we must do that immediately without further marketing discussions)
- Must specify the types of information that constitute CPNI
- Must describe the purposes for which CPNI will be used
- Must state the approval is for the length of the call only
- Must be clear to the customer and not misleading

The call may state that use of CPNI will enhance Kingdom's ability to offer products and services tailored to the customer's needs.

Release of CPNI due to Bankruptcy, Cessation of Operation, Merger, or Transfer of Assets

The exiting carrier shall provide customers with advance notice of the transfer of CPNI information. If the exiting carrier does not provide CPNI data to the new carrier, the company receiving the new customers shall send a new CPNI notice to the customers acquired from the exiting carrier. The corporate officer will attest compliance of the above notification procedures if these events occur.