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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification (covering calendar year 2014)

Date filed: February 19, 2015

Name of company covered by this certification: Eagle Telephone System, Inc., d/b/a Snake River PCS

Form 499 Filer ID: 809186

Name of signatory: Michael Lattin

Title of signatory: President

I, Michael Lattin, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. Moreover, the company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Michael Lattin

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. PART 64, SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains how the operating procedures of Eagle Telephone System, Inc., d/b/a Snake River PCS ("Eagle") ensures its compliance with the Commission's CPNI rules, as codified at 47 C.F.R. Part 64, Subpart U.[1]

Eagle does not presently use CPNI for marketing purposes and has not engaged in, and has no present plans to engage in, any marketing or cross marketing that would require customer approval, such as opt-in or opt-out approval, under Sections 64.2005-64.2007 of the Commission's rules, 47 C.F.R. §§ 64.2005-64.2007. Accordingly, Eagle has no need to develop any procedures, and does not have any such procedures, at this time to ensure that such a marketing program would comply with those portions of 47 C.F.R. Part 64, Subpart U that address marketing or cross-marketing. If, in the future, Eagle should determine that it will engage in any marketing or cross marketing not allowed by Section 64.2005 without customer approval, Eagle will develop and implement the appropriate operating procedures to ensure compliance with the relevant provisions of Subpart U.

Pursuant to Section 64.2010 of the Commission's rules, Eagle utilizes a number of safeguards pertaining to the disclosure of CPNI. 47 C.F.R. § 64.2010. Eagle's personnel are trained on the appropriate uses of CPNI. Eagle has internal procedures in place, including express disciplinary procedures, to protect against the unauthorized disclosure of CPNI to third parties. Finally, all outbound marketing is done pursuant to supervisory review and approval, with records maintained as appropriate.

Further, Eagle does not provide any call detail or other CPNI information online, or in response to customer-initiated phone calls. Rather, Eagle provides such information as follows:

1. In Person Office Visit. A customer may obtain call detail and other CPNI about their account at our business office during normal business hours, providing the customer: (a) is the customer of record on the account for which such information is being sought, and (b) presents a valid government-issued photo identification.

2. Mail to Address of Record. Upon customer request, call detail and other CPNI will be sent via First Class United States Mail and/or electronic mail to the customers' address of record, if the record has been on file with Eagle for at least thirty (30) days.

3. Call-back to the Number of Record. Upon reasonable customer request, Eagle will provide call detail and other CPNI by calling the customer's

[1] Eagle is both a local exchange carrier and a CMRS provider.

telephone number of record, providing such number has been on file with Eagle for at least thirty (30) days.

Pursuant to Section 64.2011 of the Commission's rules, Eagle observes the following protocol in the event of a CPNI security breach. 47 C.F.R. § 64.2011. Specifically:

1. Law Enforcement Notification. Michael Lattin, President of Eagle, or his designee will, within seven (7) business days after reasonable determination that a breach of CPNI has occurred, by means of electronic notification, inform both the Federal Bureau of Investigation ("FBI") and the United States Secret Service ("USSS") regarding the type of CPNI accessed and the severity of the security breach.

2. Customer Notification. Eagle will not notify customers or disclose the breach of CPNI to the public until seven (7) full business days have passed after notification to the FBI or the USSS, except: (a) where Eagle determines that an extraordinarily urgent need exists to notify a customer or a class of customers in order to avoid immediate and irreparable harm, and the FBI and the USSS agree, or (b) where either the FBI or the USSS directs Eagle to delay notification for up to thirty (30) days, subject to further extension.

3. Record Retention. Eagle will maintain an electronic record of any CPNI breaches that have occurred for at least two (2) years. Such record will include, where available, the date on which a CPNI breach was discovered, the date on which the FBI and the USSS were notified, plus a detailed description of the CPNI that was compromised and the method by which the breach took place.