February 25, 2015

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

Re: EB Docket No. 06-36
Certification of CPNI Filing, February 25, 2015
Trumansburg Telephone Company, Inc.

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 4-138 (Feb. 25, 2015), attached please find Trumansburg Telephone Company's Certification of CPNI Filing and the accompanying descriptive statement 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,

Sean Socha, C.F.O.

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WITH OFFICES IN PHELPS, VICTOR AND BUFFALO
OVER 100 YEARS OF EXCELLENCE
TRUMANSBURG TELEPHONE COMPANY, INC.

PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 09-9
January 7, 2009

EB Provides Guidance on Filing of 2008 Annual Customer Proprietary Network Information (CPNI) Certifications Under 47 C.F.R. §64.2009(e)

EB Docket No. 06-36

In this Public Notice, the Enforcement Bureau (Bureau) responds to requests for guidance on the suggested format and procedures for the filing of annual CPNI compliance certifications (CPNI Certifications) pursuant to 47 C.F.R. § 64.2009(e). CPNI Certifications must be filed annually between January 1 and March 1, in accordance with the procedures outlined below.

Background. On April 2, 2007, the Commission released a *Report and Order and Further Notice of Proposed Rulemaking* in CC Docket No. 96-115 and WC Docket No. 04-36 (*EPIC CPNI Order*)[1] in which the Commission strengthened its privacy rules, pursuant to section 222 of the Communications Act, as amended, by adopting additional safeguards to protect CPNI against unauthorized access and disclosure.[2] One important change to the existing CPNI rules adopted in the *EPIC CPNI Order* is the requirement that all companies subject to the CPNI rules file annually, on or before March 1, a certification with the Commission pursuant to amended rule 47 C.F.R. § 64.2009(e).[3] This collection has been approved by OMB under control number 30600715. Prior to the 2008 annual filings, the Bureau released a Public Notice providing a suggested template that filing entities could use to meet the annual certification filing requirement.[4]

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[1] *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)("EPIC CPNI Order").

[2] *See* 47 U.S.C. § 222.

[3] 47 C.F.R. § 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an 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. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

[4] Public Notice, *EB Provides Guidance on Filing on Annual Customer Proprietary Network Information (CPNI) Certifications Under 47 C.F.R. § 64.2009(e)*, 08-171 (Jan. 29, 2008).

Format of CPNI Certifications. The Bureau provides the attached suggested template that filing entities can use to meet the annual certification filing requirement of 47 C.F.R. § 64.2009(e). Use of this template is not mandatory, and any document that meets the requirements of the rule may be filed. Parties that elect to use the suggested template are encouraged to review the template carefully and to ensure that all fields are fully completed before submission.

Filing procedures. All filings must reference **EB Docket No. 06-36**. All filings must be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, Federal Communications Commission, 445 12th Street, SW, Suite TW-A325, Washington, DC 20554, and one (1) copy must be sent to Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554, telephone 202-488-5300, facsimile 202-488-5563, or via e-mail FCC@BCPIWEB.COM. Certifications may be filed: (1) using the Commission's Electronic Comment Filing System (ECFS); (2) or by filing paper copies.

- Electronic Filers: Certifications may be filed electronically using the Internet by accessing the ECFS: http://www.fcc.gov/cgb/ecfs/. Filers should follow the instructions provided on the website for submitting comments.

- In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov, and include the following words in the body of the message, "get form." A sample form and directions will be sent in response.

- Paper Filers: Parties who choose to file by paper must file an original and four copies of each filing. Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail (although we continue to experience delays in receiving U.S. Postal Service mail). All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- The Commission's contractor will receive hand-delivered or messenger-delivered paper filings for the Commission's Secretary at 236 Massachusetts Avenue, NE., Suite 110, Washington, DC 20002. The filing hours at this location are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of before entering the building.

- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.

- U.S. Postal Service first-class, Express, and Priority mail should be addressed to 445 12th Street, SW, Washington DC 20554.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (tty).

Filings and comments are also available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC, 20554. They may also be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC, 20554, telephone 202-488-5300, facsimile 202-488-5563, or via e-mail FCC@BCPIWEB.COM.

For further information regarding the annual certification filing contact the following individuals in the Telecommunications Consumers Division, Enforcement Bureau: Robert Somers, (202) 418-1483, Edward Hayes, (202) 418-7994, Donna Cyrus, (202) 418-7325, or Marcy Greene, (202) 418-2410.

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015

Date filed: 2-25-15

Name of company(s) covered by this certification: Trumansburg Telephone Company

Form 499 Filer ID: 805662

Name of signatory: Sean Socha

Title of signatory: CFO

I, Sean Socha, 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 attach accompanying statement.

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.
If affirmative: Provide explanation of any actions taken against data brokers

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure 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).
If affirmative: Provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

Signed _____ [signature]

TRUMANSBURG TELEPHONE COMPANY

CPNI OPERATING GUIDELINES

Trumansburg Telephone Company (Company) adheres to the following guidelines:

General Company Policies

The Company uses, discloses, or permits access to CPNI to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

The Company uses, discloses, or permits access to CPNI for the purpose of providing or marketing service offerings among the categories of service to which the customer already subscribes from the Company, without customer approval.

The Company shares CPNI only among the carrier's affiliated entities that provide a service offering to the customer. Except as noted herein, the Company does not share CPNI with its affiliates from which its customer does not take service.

The Company does 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 subscriber does not already subscribe from the Company, unless the Company has customer approval to do so, except in accordance with exceptions described below that are consistent with 47 CFR § 64.2006(c), where such disclosure is related to inside wiring, maintenance, repairs and the marketing of adjunct-to-basic services.

The Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers. For example, the Company does not use local service CPNI to track all customers that call local service competitors.

The Company uses, discloses, or permits access to CPNI, without customer approval in its provision of inside wiring installation, maintenance, and repair services.

The Company uses CPNI, without customer approval, to market our services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call

blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

Company Policy Governing the Approval Required for Use of Customer Proprietary Network Information.

The Company obtains approval through oral methods and we understand that the Company bears the burden of demonstrating that such oral approval has been given in compliance with the applicable FCC Rules.

The customer's approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by the Company remains in effect until the customer revokes or limits such approval or disapproval.

The Company maintains records of approval for at least one year or until the customer cancels service. This is accomplished by entering notations in the Customer Account Record as to the customer's approval decision regarding the use of their CPNI.

The Company requires customers to provide a password before information about a customer's account is discussed with the customer.

To date, the Company has not needed to seek customer-wide opt-in or opt-out approvals for any if our sales and marketing activities. Approvals, when necessary, are obtained orally from the customer and documented in our Customer Record System.

Joint Venture/Contractor Safeguards: The Company discloses or provides access to CPNI to its joint venture partners or independent contractors only upon the execution of confidentiality agreements with independent contractors or joint venture partners that comply with the following requirements. The confidentiality agreement shall:

(i) Require that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which that CPNI has been provided;

(ii) Disallow the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any other party, unless required to make such disclosure under force of law; and

(iii) Require that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

Except for use and disclosure of CPNI that is permitted without customer approval under 47 CFR § 64.2005, or that is described above, or as otherwise provided in section 222 of the Communications Act of 1934, as amended, the Company uses, discloses, or permits access to its customer's individually identifiable CPNI subject to opt-in approval only.

Company Policies Regarding the Notice Required for Use of Customer Proprietary Network Information.

The Company provides individual notice to customers when soliciting approval to use, disclose, or permit access to customers' CPNI.

The customer notification provides sufficient information to enable the customer to make an informed decision as to whether to permit a carrier to use, disclose, or permit access to, the customer's CPNI.

The Company ensures that the notification is comprehensible and must not be misleading.

The Company may from time-to-time state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs.

The Company does not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

The Company ensures that any solicitation for approval is proximate to the notification of a customer's CPNI rights.

The Company provides notification to obtain opt-in approval through oral methods.

The Company uses oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call. The contents of any such notification comply with the CPNI standards except that the Company may omit any of the following notice provisions if not relevant to the limited use for which the carrier seeks CPNI: The Company does not advise customers if they have opted-out previously, since no action is needed to maintain the opt-out election; the Company does not advise customers that they may share CPNI with their affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party; the Company does not disclose the means by which a customer can deny or withdraw future access to CPNI, and the Company explains to customers that the scope of the approval that the Company seeks is limited to one-time use; and; the Company omits disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, since the

Company communicates clearly that the customer can deny access to his CPNI for the call.

Company Policies Regarding Safeguards for Use of Customer Proprietary Network Information.

The Company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

The Company trains its personnel as to when they are and are not authorized to use CPNI, and the Company has an express disciplinary process in place.

The Company maintains records and documents of its own and, as may exist, its affiliates' sales and marketing campaigns that use its customers' CPNI. The records and documents provide the ability to obtain a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. The Company retains the record for a minimum of one year.

The Company has implemented a formal supervisory review process regarding its compliance with applicable FCC rules for outbound marketing situations. Currently, the Company only utilizes trained Company personnel for the purpose of outbound marketing programs. These Customer Services Reps (CSR) are trained on the proper use of CPNI prior to outbound sales initiatives. Additionally, the close proximity of the CSR supervisor to those making outbound sales calls provides sufficient oversight of CPNI compliance. Sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

To the extent that the Company ever utilizes the opt-out CPNI approval approach, the Company will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. The notice will be in the form of a letter, and will include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. This notice will be submitted even if the carrier offers other methods by which consumers may opt-out.

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Trumansburg Telephone Company
STATEMENT OF COMPANY POLICY

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of Trumansburg Telephone Company.

Trumansburg Telephone Company (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any 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 virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.

- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.

- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 CFR 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.