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February 27, 2015

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

RE: **EB Docket No. 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2014
United States Cellular Corporation and Affiliates

Dear Ms. Dortch:

Transmitted herewith, on behalf of United States Cellular Corporation and its affiliates, please find its 2014 CPNI Certification and Accompanying Statement for filing in the above-referenced docket.

In the even there are any questions in connection with this filing, please communicate with the undersigned.

Very truly yours,

Peter M. Connolly

Enclosures

cc: Best Copy and Printing, Inc. via electronic mail

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Annual 47 C.F.R. § 64.2010(e) CPNI Certification

EB Docket 06-36

Annual 64.2010(e) CPNI Certification for 2014

Date filed: February 27, 2015

Name of company covered by this certification: United States Cellular Corporation and its affiliates listed in Attachment A

Form 499 Filer ID: See Attachment A

Name of signatory: Steven T. Campbell

Title of signatory: Executive Vice President - Finance, Chief Financial Officer and Treasurer

I, Steven T. Campbell, 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, recordkeeping, and supervisory review) 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 in the past year.

The company has received 193 customer complaints in the past year concerning the alleged unauthorized release of CPNI. This number of complaints is from a subscriber line base of approximately 4,646,000 subscriber lines. Of these complaints, 153 were related to alleged instances of improper access, use, or disclosure by employees (24% of which involved allegations of disclosure of CPNI to unauthorized third parties by specific employees), 11 were related to improper access to online information by individuals not authorized to view the information, and 29 were related to various instances of improper disclosure to individuals not authorized to receive the information. Approximately 54% of these complaints appeared to relate to a personal issue between individuals such as a domestic dispute. Of the 193 customer complaints received, 52 were determined to be breaches of customers' CPNI and were subsequently reported to the United States Secret Service and Federal Bureau of Investigation through the Commission's central reporting facility.

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 _____

Steven T. Campbell
Executive Vice President – Finance, Chief Financial Officer and Treasurer
United States Cellular Corporation

Attachment A
Company Names and Filer ID

Filer ID	Company Name	FEIN
802587	USCOC of Greater North Carolina, LLC	36-3779831
802608	California Rural Service Area #1, Inc.	39-1740935
802611	USCOC of Pennsylvania RSA #10-B2, Inc.	39-1876663
802614	Hardy Cellular Telephone Company	31-1266169
802623	Vermont RSA No. 2-B2, Inc.	39-1737238
802626	Manchester-Nashua Cellular Telephone, L.P.	36-3982320
802641	USCOC of Greater Iowa, LLC	26-3769148
802644	Cedar Rapids Cellular Telephone, L.P.	36-3850690
802647	Bangor Cellular Telephone, LP	36-3880521
802685	USCOC of Cumberland, Inc.	36-3862875
802692	Kansas #15, LP	34-1675512
802704	USCOC of LaCrosse, LLC	36-3553841
802716	Tennessee RSA No. 3 Limited Partnership	62-1461122
802722	United States Cellular Operating Company of Knoxville	62-1147327
802731	USCOC of South Carolina RSA #4, Inc.	39-3811996
802737	Yakima MSA Limited Partnership	48-1066533
802743	Dubuque Cellular Telephone, L.P.	36-3880530
802746	Farmers Cellular Telephone Company, Inc.	42-1334334
802749	Iowa RSA No. 9 Limited Partnership	36-3668199
802755	Iowa RSA No. 12 Limited Partnership	36-3704891
802758	United States Cellular Operating Company of Medford	36-3584090
802761	McDaniel Cellular Telephone Company	93-0996859
802764	USCOC of Washington 4, Inc.	36-3645818
802767	Oregon RSA #2, Inc.	39-1669888
802779	Western Sub-RSA Limited Partnership	36-3804455
802785	USCOC of Oregon RSA #5, Inc.	39-1735612
802794	USCOC of Greater Missouri, LLC	36-3623765
802821	Indiana RSA No. 5 Limited Partnership	35-1805733
802824	Indiana RSA No. 4 Limited Partnership	35-1805731
802833	United States Cellular Telephone Company (Greater Knoxville), L.P.	36-3332471
802849	Texahoma Cellular Limited Partnership	75-2494073
802851	NH #1 Rural Cellular, Inc.	36-3717952
802860	Maine RSA #1, Inc.	36-3717943
802863	USCOC of Greater Oklahoma, LLC	36-3811995
807699	USCOC of Virginia RSA #3, Inc.	72-1176997
817226	Madison Cellular Telephone Company	91-1387617
817230	Kenosha Cellular Telephone, L.P.	39-1757974
817232	Racine Cellular Telephone Company	91-1431833
818126	Jacksonville Cellular Telephone Company	56-1585202
818128	Wilmington Cellular Telephone Company	31-1221413
821504	USCOC of Richland, Inc.	36-4404449
821506	Maine RSA #4, Inc.	36-3717946
821508	United States Cellular Operating Company LLC	36-3363349
821600	USCOC of Central Illinois, LLC	68-0231012
823622	USCOC of Rochester, Inc.	54-2042835
825693	USCOC Nebraska/Kansas, LLC	20-3466461
827675	Carroll Wireless, LP	20-1914392
828729	Barat Wireless, LP	20-4824235

2014 Statement of CPNI Compliance Procedures

United States Cellular Corporation on behalf of its CMRS operating affiliates (collectively "U.S. Cellular" or the "Company") has established operating procedures that are adequate and intended to ensure compliance with the requirements of Section 222 of the Telecommunications Act of 1996, as amended, and with the implementing rules adopted by the Federal Communications Commission at 47 C.F.R. Part 64, Subpart U ("CPNI Rules"). Unless otherwise stated, this statement reflects the operating procedures in place as of December 31, 2014.

Responsibility for the overall compliance of the Company with the CPNI requirements lies with the Director of Privacy who reports to the Vice President, Legal and Regulatory Affairs. Among other things, the Director of Privacy is required to do a quarterly assessment of the status of U.S. Cellular's compliance efforts with the CPNI Rules and other privacy protection initiatives. The Company has a process that supports management's ability to have personal knowledge that the operating controls and procedures that have been established in their respective areas of responsibility are in place and working. This process requires that key managers ("Control Owners"), whose organizational responsibilities include the oversight of specific operating procedures and controls that support compliance with the CPNI Rules, test controls and procedures and submit reports to their manager ("Process Owners") on the results of their findings. These reports are subsequently submitted by the Process Owners to the Director of Privacy along with an accompanying statement that the Process Owners have reviewed and approved the reports. This process will be updated on an ongoing basis as controls and procedures change over time.

U.S. Cellular has implemented the following procedures in order to protect the CPNI of U.S. Cellular's customers:

Permission Notice for use of CPNI by Agents and Affiliates:

Currently, U.S. Cellular exclusively provides CMRS services. Thus, every marketing interaction that it has with customers is exclusively "within category" as the FCC has defined that term and for which no explicit permission from customers is required for the use of their CPNI by the Company for marketing purposes. U.S. Cellular also has an agent distribution channel ("Agent") for both in-bound and out-bound customer interactions and relationships with other affiliates ("Affiliates") who may from time to time have a need to access customer information for marketing telecommunication services to customers. With respect to the sharing of CPNI with Agents and Affiliates for marketing purposes, U.S. Cellular obtains permission from customers using the FCC sanctioned Notice and Opt-Out method as follows:

- Postpaid customers are sent a CPNI Notice shortly after establishing service informing them about CPNI and their right to restrict the Company from sharing their CPNI with Agents and Affiliates for the purposes of marketing the

Company's or its affiliated companies' products and services. Prepaid customers are sent a text message containing a link to a web page providing them with the same CPNI Notice shortly after establishing service. Copies of the CPNI Notice are posted on U.S. Cellular's website as well as made available upon request at its retail stores or through its call centers.

- Although not required by the CPNI rules, all mailed notices are in dual language (English and Spanish) and the contents of the Notice satisfy the substantive requirements of 47 C.F.R, 2008 (2)(c)(1) through (10).

- A campaign planning and management system is used to plan for and generate campaigns for CPNI notices to existing customers no less than every 2 years.

- Customers are given a minimum of 33 days to respond to the CPNI Notice before they are considered to have provided implied consent to allow U.S. Cellular to share their CPNI with Agents and Affiliates for the purposes of marketing the Company's or its affiliated companies' products and services. The billing system maintains the CPNI status of a customer as being in the initial notification waiting period, having opted out, or having implied consent. Agents have received specific written direction that they are not to access any CPNI from new customers for marketing purposes until the initial notification waiting period has passed for determining the customer's CPNI permission status.

- An Interactive Voice Response ("IVR") system with a dedicated toll-free number is available on a 24/7 basis (except for minimum downtime for required maintenance in off-hours) for customers to contact in order to opt-out. Customer calls are automatically routed to a call center or voicemail box in the event that the IVR is unavailable. Customers may also visit a Company owned retail store or call Customer Service to opt-out. There is no additional cost to the customer to use any of these opt-out methods.

- A process is in place for the monitoring, reporting, and escalation of the IVR system's availability to support customer opt-out calls.

Approval for use of CPNI:

- Customer elections to opt-out from granting U.S. Cellular permission to allow its Agents and Affiliates to use their CPNI for the purposes of marketing the Company's products and services remain in effect until a customer requests that such election be revoked.

- Records of customer opt-out elections are maintained in U.S. Cellular's customer information billing system for at least as long as customers remain in active status.

- Customers' opt-out status is automatically updated daily in the campaign management system used by the internal U.S. Cellular marketing employees who prepare marketing campaigns.

General Safeguards for use of CPNI

- All Company and Agent employees are required to complete CPNI training within their first 30 days of employment or prior to working in a front line position. Additional policy and procedures training is provided to front line employees. All employees are required to complete a refresher course annually following the calendar year in which they are hired.

- U.S. Cellular has an express disciplinary process in place to protect customer privacy and CPNI. Although employees are subject to progressive disciplinary actions for failures to comply with the Company's policies pertaining to customer privacy and CPNI, providing call and message detail to a customer that has not been authenticated in accordance with the Company's procedures or to an unauthorized party subjects employees to significant disciplinary action up to and including immediate termination. Agents of the Company are informed in writing of their obligations to protect customer privacy and CPNI and are subject to disciplinary actions including possible contract termination for non-compliance with the terms of their agreements.

- Company and Agent direct marketing and market research campaigns to existing customers using CPNI are documented, reviewed, and approved by a manager with supervisory authority. U.S. Cellular policy requires that the campaign records be stored for a minimum of one year.

Authentication

- Customers are authenticated when requesting CPNI over the phone by providing multiple personal identification elements. A pop up screen provides a reminder to call center employees on each incoming call that they must authenticate a customer before providing any confidential personal information including CPNI. The employee must close the pop-up screen in order to be able to proceed further and have access to any customer record. As described above, a failure by an employee or an Agent to authenticate a customer prior to disclosing, adding or changing customer account information, including but not limited to CPNI, subjects that employee or Agent to U.S. Cellular's disciplinary process.

- Employees and Agents are authenticated when requesting CPNI over the phone on behalf of customers by providing a Security Word in addition to other personal identification information. The Security Word is changed frequently.

- U.S. Cellular policy prohibits employees from using readily available biographical information ("RABI") or account information to prompt customers for their passwords.

- U.S. Cellular policy prohibits employees from providing call or messaging detail over the phone even if the customer has been properly authenticated. U.S. Cellular policy requires that requests for call or messaging detail from customer-initiated phone contacts by postpaid customers be fulfilled by mailing the information to the address of record for the account.

- U.S. Cellular policy requires that its customers be authenticated by employees and Agents with a valid government issued photo ID before providing CPNI during an in-store contact at retail stores.

- Registration for an online account with access to billing information and CPNI requires a unique PIN in addition to account information and does not rely solely on RABI or account information. The PIN number is sent via a text message to a telephone number of record selected by the customer. Subsequent access to CPNI online by a customer requires a unique username and password which is established by the customer. Back up authentication methods for lost or forgotten passwords do not use RABI or account information. Customers who cannot provide the proper responses to back up authentication questions are sent a temporary password to the email address of record for their account that they may use to reset their username or password. Customers may also go to a retail store and authenticate with a valid government issued photo ID in order to reset their username or password.

Notification of account changes

- A text message is sent to a telephone number of record to notify the customer when an online account, password, email address, or response to a back-up means of authentication for lost or forgotten password is created or changed. A letter is sent to the postal address of record when a postal address of record is created or changed for a postpaid customer.

Notice of unauthorized disclosure of CPNI

A Privacy Incident Response Plan including a Privacy Incident Response Team ("PIRT") has been created to handle the internal investigation and reporting of events that may result in reportable breaches of CPNI. Information about how to report such events is readily available to all employees on the Company's internal website and in the Company's training courses.

Other measures to protect CPNI

- U.S. Cellular proactively alerts employees in sales channels and call centers when suspicious pretexting attempts are identified. Alerts are given to the respective retail stores in the area or across call center departments to alert them to this activity.

- There are formalized processes that address the management of access to the centralized customer management system that stores CPNI. These processes address:
    - Requesting and approving access to applications that access CPNI, including administrative access. This process is partially automated.
    - Periodic employee entitlement reviews for appropriate level of access, including administrative access. This includes protection against the accumulation of access rights during employee role transfers.
    - Removal of access rights for terminated employees.
    - Separate developer access procedures requiring higher level of approval that are routinely reviewed.
    - Periodic auditing of these processes.

- Vulnerability scans on externally-facing and internal U.S. Cellular systems are performed routinely. These activities attempt to discover vulnerabilities that may be exploited to compromise the security of the internal U.S. Cellular network and the customer data it contains. Vulnerabilities (including systems patching) are assessed, prioritized, and scheduled for remediation as appropriate.

- Next-generation firewalls are used to detect application-specific attacks and enforce an application-specific granular security policy on the network perimeter. Application and threat signature databases are updated routinely. Layers of firewalls also secure the demilitarized zone and internal systems. Firewalls restrict and filter connectivity to the systems that provide access to CPNI.

- Anti-virus software is installed on workstations to help protect against known viruses, worms, and Trojans.

All of the foregoing measures demonstrate that U.S. Cellular has established operating procedures that are adequate to ensure compliance with the FCC's CPNI Rules