Clarence Telephone
Cedar Communications

February 27, 2015

Ms. Marlene H. Dortch
Federal Communications Commission (FCC)
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for electronic filing in compliance with the FCC customer proprietary network information (CPNI) rules under 47 C.F.R. § 64.2009(e) is the 2014 CPNI annual compliance certification and accompanying statement of operating procedures for Cedar Communications (499 Filer ID: 820069).

Please contact me if you have any questions or concerns regarding this filing.

Respectfully Submitted,

Curtis Eldred
Compliance Officer
cpeldre@netins.net
563-452-3852

Attachments

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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 2014

Date filed: February 27, 2015

Name of companies covered by this certification: Cedar Communications

Form 499 Filer ID: 820069

Name of signatory: Curtis Eldred

Title of signatory: Compliance Officer

I, Curtis Eldred, 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. *See attached accompanying statement of operating procedures.*

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.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

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: _____

Attachment: Accompany Statement explaining CPNI procedures

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Attachment: Accompanying Statement of Operating Procedures

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, Cedar Communications (499 Filer ID: 820069), herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

1. CPNI manual has been reviewed in order to ensure compliance for all FCC CPNI rules and has been adopted by our Company's board
2. CPNI Compliance officer has been designated and oversees all CPNI duties, training, and activity
3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
    - Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
4. Carrier authentication requirements have been met
    - All customers during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail or call detail) without utilizing readily available biographical or account information as defined by the FCC
    - Call detail is only released to customers during customer-initiated telephone contact if a password is provided. If the requesting customer does not provide a password, only the following FCC approved methods are permitted for the release of the requested call detail:
        - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
        - Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
        - Having customer come in to Company's office and provide a valid government issued photo ID
5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
    - password
    - customer response to a back-up means of authentication for lost or forgotten passwords
    - online account
    - address of record
6. Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
7. CPNI is not utilized for marketing purposes
    - Marketing campaigns are only done by sending promotions to all customers, which are documented
    - One time oral marketing approval method may be used at times
8. Additional protection measures are taken above and beyond the current FCC CPNI rules
    - Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
    - Company maintains security of all CPNI, including but not limited to:
        - Documents containing CPNI are shredded
        - Computer terminals are locked when employee is not at the station