

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

EB Docket 06-36

**Annual 64.2009(e) CPNI Certification for Calendar Year 2015**

Date: January 26, 2016

Name of Company covered by this certification: **Columbus Communications Services LLC, dba Columbus Telephone Company**

Form 499 Filer ID: **805716**

Name of signatory: **Patricia Carroll**

Title of signatory: **Corporate Secretary**

I, Patricia Carroll, 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, as Exhibit 1, 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 (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).



Patricia Carroll  
Corporate Secretary

Columbus Cummunications Services LLC  
Columbus Telephone Company  
224 S. Kansas Ave.  
Columbus, KS 66725

**Exhibit 1**

**Accompanying Statement**

**Annual 47 C.F.R. Section 64.2009(e) Customer Proprietary Network  
Information (CPNI) Operating Procedures Compliance Statement  
EB Docket 06-36**

This *Operating Procedures Compliance Statement* for Columbus Telephone Co. (the "Company") explains 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.

- A. Notice to customers of their right to restrict use of, disclosure of, and access to their CPNI is provided prior to solicitation for customer approval
- B. All Company employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI. The Company holds occasional training sessions for employees reviewing when they are and are not authorized to use or disclose CPNI, followed by a supervisory review process regarding compliance with CPNI rules. The Company also sends, via company email or other methods the Company chooses to employ, information to employees relating to CPNI compliance.
- C. Every employee of the Company has a duty to protect the confidentiality of CPNI. A violation of the Company's operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.
- D. The Company maintains records of its own and its affiliates' sales and marketing endeavors that use customer CPNI, including instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. Our records describe the event, the specific CPNI that was used in the event, and what products and services were offered as a part of the marketing and sales event. The Company retains records for a minimum of one year.
- E. The Company has established a review process for ensuring compliance with CPNI rules related to marketing activities. The Company's sales force and marketing personnel obtain approval for all requests for CPNI information. Specifically, use of CPNI obtained from the Company's provision of one

service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.

- F. To safeguard CPNI, the Company employs reasonable and required measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees follow procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact, online account access, and in- person visits.
- G. The Company will notify a customer immediately of account activity involving a change to an address of record. Notification may be sent by email, voicemail, text message or US Mail to both the customer's prior and updated address of record.
- H. In establishing a password, the Company authenticates the customer without the use of readily available biographical information, or account information. The Company has a back-up plan in the event of a lost or forgotten password, however if a customer cannot provide the correct password or the correct response for the back-up authentication method, the customer must establish a new password.
- I. As required by CPNI rules and as outlined in the Company's operating procedures, law enforcement notification procedures are strictly adhered to. Should any breach of CPNI integrity be discovered, the Company will develop and maintain a record as to the date of the breach discovery, who discovered the breach, and the resulting notifications to the United States Secret Service and the Federal Bureau of Investigation no later than 7 days from the date of the discovery of the breach. The records of these discovered breaches will be maintained and held by the Company for no less than (3) years.

**Action taken by the Company against employees/data brokers for unauthorized release of CPNI**

No employee or data broker actions of unauthorized release were received by the Company during calendar year 2015.

**Customer complaints received by the Company for unauthorized release of CPNI**

No customer complaints concerning the unauthorized release of customer proprietary network information were received during the calendar year 2015.