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February 9, 2016

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

RE: Midcontinent Communications
Annual Customer Propriety Network Information Certifications
EB Docket No. 06-36

Dear Ms. Dortch:

Midcontinent Communications ("Midcontinent"), by its attorney, hereby submits it annual customer proprietary network information ("CPNI") certification. Please inform me if any questions should arise in connection with the filing.

Respectfully submitted,

Patrick J. Mastel
Associate General Counsel
Midcontinent Communications

Enclosure(s)

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015

Date filed: February 9 , 2016

Name of company covered by this certification: Midcontinent Communications

Form 499 Filer ID: 802284

Name of signatory: Scott Anderson

Title of signatory: Chief Legal Officer

I, Scott Anderson, 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 (proceeding 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 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 _____

Midcontinent Communications
Its Chief Legal Officer
By Midcontinent Communications Investor, LLC,
Managing Partner of Midcontinent Communications

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Midcontinent Communications CPNI Compliance Procedures

Midcontinent Communications policies and procedures to meet the guidelines of CPNI include:

Marketing:

- The Chief Marketing Officer approves all direct marketing to ensure compliance with the CPNI rules
- Marketing has safeguards to prevent cross product information sharing that would be in violation of CPNI rules
- Marketing does not sell customer lists to outside sources

Customer Service:

- Customer service has extensive training, as part of new hire training and on an annual basis, on the importance of customer confidentiality.
- Employees must sign an acknowledgement that they have been advised of and understand the importance of customer privacy every time they receive training on confidentiality.
- Customers must verify their personal account information before an employee can provide comments or take requests for any changes to an account. At a minimum, customers must provide their name, address and a password of their choice which may be the last four digits of their social security number or date of birth. For in-person requests, customers must present valid photo identification.
- Every entry into a customer account is tagged with the user name entering the account and the user is required to make comments on why the account has been opened
- Customer service representative interactions with customers are monitored for quality assurance, and the monitoring includes evaluation of compliance with privacy requirements.
- Employees have been trained on how to report security breaches.
- Customers that request call detail information by phone will be provided with that information only by mail to the address of record or via a return call to the telephone number of record for the account. Customers may obtain call detail information in person only after presenting valid photo identification.

Order Processing/Provisioning:

Passwords are used to get into any of Midcontinent systems

- Every entry into a customer account is tagged with the user name entering the account
- Paper documents are scanned and stored electronically for safe keeping and paper copies are shredded

- Processes have been put into place to notify a customer when there has been a request to create or change the customer's address of record, password, back-up for forgotten passwords, or an online account

Technicians

- Employees have been trained on the need to protect customer CPNI
- Employees have been trained on how to report security breach

Management:

- Managers receive training on customer confidentiality on an annual basis
- Managers monitor and coach employees on maintaining customer confidentiality

CPNI Security Breaches

- Midcontinent employs a full time security person to monitor and proactively review network usage to minimize the threat of a security breach.
- Midcontinent notifies law enforcement of all breaches of its customers' CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.
- Midcontinent notifies customers of all breaches of their CPNI pursuant to the procedures and timeframes described in Section 64.2011 of the FCC's rules.
- Midcontinent maintains records of all discovered security breaches and of all notifications of security breaches made to law enforcement and customers for a period of two (2) years. The records include, to the extent possible, the dates of discovery and notification, detailed descriptions of the CPNI that was breached and the circumstances of the breach.

Other procedures to assure compliance with CPNI rules:

- Customer privacy is a part of all job descriptions.
- CPNI compliance processes are reviewed and updated annually or as regulations may require changes.
- Employee training on CPNI is done upon hiring and annually or as processes may change. Employees sign an acknowledgement at each training session.
- Compliance is monitored by managers listening to telephone conversations between employees and customers and/or monitoring data entry for any unusual activities or violation of CPNI rules.
- Compliance is part of an employee annual evaluation process. Compliance can affect employees' raises, promotions, or continued employment.
- Procedures have been put into place for dealing with third parties, including law enforcement.
- An Annual Notice is sent to all customers regarding Midcontinent's CPNI and Privacy Policy.