Customer Proprietary Network Information (CPNI) Certifications
Under 47 CFR § 64.2009(e), EB Docket No. 06-36

February 12, 2016

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

RE: Annual 64.2009(e) CPNI Certification for Calendar Year 2015 for Oregon-Idaho Utilities, Inc. and Oregon-Idaho Utilities, Inc. DBA Humboldt Telephone Company Form 499 Filer ID(s): 803181.

Customer Proprietary Network Information (CPNI) Certifications
Under 47 CFR § 64.2009(e), EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year 2015

Date Filed: February 12, 2016

Name of Company(s) covered by this certification: Oregon-Idaho Utilities, Inc. and Oregon-Idaho Utilities, Inc. DBA Humboldt Telephone Company

Form 499 Filer ID(s): 803181

Name of Signatory: Douglas N. Musgrave

Title of Signatory: Assistant Corporate Secretary

I, Douglas N. Musgrave, 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the commission's rules. (See statement next page.)

The Company has not taken actions (i.e. 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 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_____

Douglas N. Musgrave
Assistant Corporate Secretary

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Name of Signatory: Douglas N. Musgrave

Statement of Compliance

Oregon-Idaho Utilities, Inc. and Oregon-Idaho Utilities, Inc. dba Humboldt Telephone Company have established procedures intended to ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the commission's rules regarding protection CPNI. These procedures include regular training for company employees on the definition of CPNI and how such data will be appropriately protected and handled by the company. The company also notifies our customers about company procedures for the handling of CPNI and when either the address of record or the CPNI pin number has been changed on a customer account. Exhibit A attached to this certification contains a copy of the company CPNI procedures. Exhibit B attached to this certification contains a copy of the customer notification of company CPNI procedures as well as a copy of the notification of change in the address of record or CPNI password for a customer account.

Exhibit A

Oregon-Idaho Utilities, Inc. and Oregon-Idaho Utilities, Inc. dba Humboldt Telephone Company CPNI Procedures and Practices

Oregon-Idaho Utilities, Inc. and Humboldt Telephone Company

CPNI Procedures and Practices

Effective December 01, 2007

As required by FCC rules, the company adopts these practices and policies relative to the exchange of Customer Proprietary Network Information (CPNI) between the company and it's customers. The intent of this document is to meet and or exceed the regulatory requirements relating to CPNI policies and practices implemented by the FCC. The company only intends to adopt those policies and practices mandated by the FCC that relate to the operations conducted by the company. All company employees should begin following these procedures on December 01, 2007 in order to meet the deadline for implementation of Dec. 08, 2007.

Definitions

Account Information – information that is specifically connected to the customer's service relationship with the company, including such things as an account number or any component thereof, the telephone number associated with the account, or the amount of a bill.

Address of Record – either postal or electronic, is an address that the company has associated with the customer's account for at least 30 days. This address should be the address used for customer correspondence or billing and not necessarily the service address.

Call Detail Information – pertains to the transmission of specific phone calls, including, for outbound calls, the number called, the time, location, or duration of any call and for inbound calls, the number from which the call was placed, and the time, location, and duration of a call.

Readily Available Biographical Information – is information drawn from the customer's life history and includes such things as the customer's social security number or the last four digits of that number; a mother's maiden name; a home address; or date of birth.

Password – an alpha, numeric, or alpha-numeric code "word" of the customer's choosing that is not based upon readily available biographical information.

Telephone Number of Record – The telephone number associated with the underlying service, not a telephone number associated as the "contact" number (not a CBR.)

Valid Photo ID – is a government-issued means of personal ID with a photograph such as a driver's license, passport, or comparable ID that is not expired.

Customer – A person (or persons as in husband and wife) having a residential telephone service account with the company under their name and that person(s) is authorized to make changes to that account. A customer's girlfriend may be near and dear to our customer, but they are not our customer. For a business account the customer is the authorized owner or authorized officer or the appointee of the authorized owner or authorized officer of the business that is authorized to make changes to the account.

Responsible Party – a person or persons that are responsible for payment on an account or that are guaranteeing payment on another person's account. An unrelated (non spouse) responsible party is not automatically authorized to make changes to a customer's account.

Pretexting – often called a "posing", when a person calls pretending to be a customer (posing as) and attempts to obtain CPNI from the company.

CPNI Authentication Requirements.

It is the policy of the company not to discuss, disclose, or release call detail information to any person other than that same customer or an authorized person on the customer's account. For that reason, the company will not release call detail information during a customer-initiated telephone contact except when the customer is authorized on the account and provides the company with a pre-arranged password to identify themselves. If the company initiates the contact with the authorized customer thru a telephone number of record, then no password or ID is required to discuss call detail information. The company will only require a password to discuss call detail information as required by regulation. Customer account information, local and general billing questions and other changes to a person's account will only be allowed by an authorized individual on the account and will not require the use of a password at this time.

The company may release call detail information to it's vendors and contract service providers as required in order to provide service, billing and collection, and conduct other necessary operations. Any customer account information including call detail information should NEVER be provided to any unauthorized person, or company.

If an authorized person calls and cannot provide us with the correct password, the company will not discuss the call detail information with that person on that call. In that case the company may either call the customer back at the telephone number of record or may send requested copies of bills or other correspondence to the customer address of record. Under no circumstance will the company send bill copies or correspondence to an address other than the address of record unless the customer can provide us with the correct password during the phone call.

If a customer writes us a letter requesting call detail information on their account then we may either call the customer back at the telephone number of record to discuss the request or we may send requested copies of bills or other correspondence to the customer address of record. Under no circumstance will the company send bill copies, account information or other correspondence to an address other than the address of record for a customer account based solely upon a written correspondence. Any reply to a written request for customer records where the information is to be sent to an address other than the address of record must be confirmed by calling the customer at the telephone number of record first.

Any customer that appears in person and requests call detail information should be an authorized person on the customer account and will be required to show a valid photo ID proving their identity prior to our releasing any information about the customer account. It is a good practice to require ID on all persons appearing in person requesting information even if you think you know the identity of the person appearing.

At the time of the initial request for service, the customer service representative will ask the customer to specify any additional authorized individuals on the account and will ask the customer to specify a password for access to call detail information. The customer should be told that the password is required by law and is necessary for their own protection and should not contain any readily available biographical information. Of course, company personnel cannot always know what is and what is not readily available biographical information, but you should discourage the use of any blatantly obvious password. A password that would be obvious would include the last 4 digits of the telephone number, the customer's first or last name, a social security number or the last 4 digits of that number or any part of a street address among other things.

If the password is to be established after the initial request for service then the company should call the customer at the telephone number of record and inform them of the need to set up a password and request that the customer set a password at that time. Additionally the authorized customer may appear in person and provide a valid photo ID in order to set the password if they choose. Customers that refuse

to set a password should be informed that we may be unable to discuss CPNI with them now and in the future unless a password is set up by one of the approved methods.

The specified password will be recorded in the record system of the company and will thereby be associated with the account. A customer may not choose multiple passwords for a single account, there must only be one. Customer's having multiple accounts may specify one password for all associated accounts or may choose a separate password for each account at their own discretion.

If a customer changes their address of record or requests a new password, and that customer is authorized and can provide the correct password or shows up in person and provides valid photo ID, then the company will make the requested change and immediately notify the customer of that change. Such notification will consist of a successful call to the telephone number of record informing the customer of the change or a letter may be sent to the previous address of record informing the customer of the change. The letter will have a pre-approved format for proper notification. A copy of all customer correspondence should be kept in the records of the company. A comment should be placed in the permanent record for the customer account specifying that notification of the change was made and the manner of notification must be specified. A successful call is classified as one in which you either speak directly to the authorized customer or where you were able to leave a message on a voice mail or answering machine.

In the event of a lost or forgotten password a replacement password will be established under the same guidelines as those for establishing a password after initial request for service. This procedure will require you to terminate the established customer initiated call and require you to initiate a new contact to the telephone number of record to verify the change. The alternate procedure would require the customer to appear in person and provide valid photo ID.

If a customer calls or appears and wants to discuss call detail information that person must authenticate by providing a correct password or valid photo ID prior to our discussing call detail information. If a customer calls or appears and cannot authenticate we may discuss call detail information with that customer if the customer can provide all information about the call without our help. *This means if a customer calls and gives us the call detail for a call as defined above but that customer cannot authenticate, then by law we MUST discuss that call and that call only with the customer.* No other call or account detail can be discussed unless the customer authenticates. We cannot discuss anything with a customer prior to authentication except call detail information where the customer provides us the entire call detail information.

These policies and procedures may be changed and updated as required to maintain regulatory compliance.

Exhibit B

Oregon-Idaho Utilities, Inc. and Oregon-Idaho Utilities, Inc. dba Humboldt Telephone Company Customer Notification of Company CPNI Procedures and Practices and Notification of Changes to Customer Address of Record or Restricted CPNI Password

ATTENTION ALL CUSTOMERS!
NOTICE OF NEW FCC REGULATIONS THAT AFFECT YOU

The FCC has recently implemented new regulations about the protection of certain types of Customer Proprietary Network Information (CPNI). These new regulations restrict the way that Oregon-Idaho Utilities and Humboldt Telephone Company can release and that you may access certain information that we store about your account with us.

These new regulations restrict us from releasing or discussing call detail information, changing your address of record, and setting or changing an account access password when you contact us first unless certain procedures are followed. The new regulations state that we cannot do these things unless:

1) You appear in person at our office in Nampa, Idaho and provide us with either the restricted CPNI password associated with the account or a valid photo ID. You must do this on each occasion where restricted CPNI information is involved. (Even if we know you personally.)
2) If you call us about restricted CPNI, you must be able to give us the correct password associated with the account for restricted CPNI. If you cannot provide us with the correct restricted CPNI password you may request that we call you at the telephone number of record. We cannot call you back at any other number.
3) If you write us about restricted CPNI, we will call you at the telephone number of record to verify that a change is desired. We cannot call you at any other number.
4) If you have lost your restricted CPNI password and need to establish a new one you may appear in person at our office in Nampa, Idaho and show us a valid photo ID or we may call you at the telephone number of record. Once again we cannot call you at any other number.
5) We will discuss call detail information with you for any call where you can provide us with specific call detail informational without help or prompting from us without a password. We will only discuss that specific call record with you. This will not act as a password so you may access other restricted CPNI without proper authentication.
6) WE also require that you must be the named customer for the account or authorized to discuss and change the account by the named customer for the account before we will discuss an account with you.
7) If you establish a restricted CPNI password with us, it cannot contain readily available biographical information (as defined below).

If you change your address of record or change your restricted CPNI password, we will notify you of the change. This notification will either be by a brief letter sent to your address of record or a telephone call to your telephone number of record. If you do not answer your phone we are permitted to leave the notification as a message on your answering machine.

We will not release restricted CPNI to any joint venture partner or independent contractor for purposes of marketing communications services to you without your prior written consent.

The FCC is currently investigating whether or not it needs to adopt further rules concerning the release of other customer account information.

Address of Record: A postal or electronic address that we have associated with your account for at least 30 days, the billing address.

Call Detail information: Any information that pertains to the transmission of specific telephone calls, including the number called to or called from, the time, location, or duration.

Telephone Number of Record: The telephone number associated with the service, not a telephone number supplied as a contact number.

Valid Photo ID: A government-issued means of personal identification with a photograph such as a driver's license, passport, or comparable ID that is not expired.

Readily Available Biographical Information: information drawn from your life history that includes your social security number or the last 4 digits of your social security number, your mother's maiden name, home address, or a date of birth.

NOTIFICATION OF CHANGE OF RESTRICTED CPNI

Date:_____

Account Number _____

Customer

_____

_____

_____

_____

Dear Customer,

Oregon-Idaho Utilities has received a request to change the ☐ restricted CPNI password / ☐ address of record for the above account. If you have questions about this change, please contact our customer service department at (800) 624-0082.

Sincerely,

Customer Service Department

NOTIFICATION OF CHANGE OF RESTRICTED CPNI

Date:_____

Account Number _____

Customer

_____

_____

_____

_____

Dear Customer,

Humboldt Telephone Company has received a request to change the ☐ restricted CPNI password / ☐ address of record for the above account. If you have questions about this change, please contact our customer service department at (800) 847-5302.

Sincerely,

Customer Service Department