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February 17, 2016

(Via ECFS)
Marlene Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th St, SW - STE TW-A325
Washington, DC 20554

RE: Docket No. 06-36
Waitsfield-Fayston Telephone Co., Inc. d/b/a Waitsfield and Champlain Valley Telecom and Green Mountain Long Distance Service, Inc.
Form 499 Filer ID: 803463 and 817194

Greetings:

Enclosed is the redacted joint CPNI Certificate for the captioned companies. I am filing this document twice via ECFS, once for each of the companies in the joint filing.

A joint request for confidentiality along with the unredacted joint CPNI Certificate is being filed on paper.

If you have any questions, please contact me.

Respectfully submitted,

Susan J Bahr

Susan J. Bahr, Esq.

Enclosures

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TO: Marlene Dortch, Secretary
Federal Communications Commission

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

Date filed: February 15, 2016

Name of companies covered by this certification:

Waitsfield-Fayston Telephone Co., Inc. d/b/a Waitsfield and Champlain Valley Telecom
Green Mountain Long Distance Service, Inc.

Form 499 Filer ID: 803463 and 817194

Name of signatory: Roger Nishi

Title of signatory: Vice President – Industry Relations

I certify that I am a corporate officer of the above Companies. Acting as an agent of the Companies, I hereby certify that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's (FCC's) rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

- Attached to this certification is Statement #1 explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules.

- The Companies have not taken any actions against data brokers in the past year.

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- In Statement #2, we discuss the processes that pretexters are using to attempt to access CPNI.

- In Statement #3, we explain additional procedures that the Companies are taking to protect CPNI.

- The Companies received just one customer complaint in the past year concerning the unauthorized release of CPNI. In that situation, the address of a customer of Waitsfield-Fayston Telephone Co., Inc. was changed without proper authorization, resulting in the improper disclosure of CPNI to an individual not authorized to receive the CPNI.

The Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Companies also acknowledge 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.

A copy of this Certificate and Statements, but with redactions in Statements 2 and 3, is being filed for public inspection. In addition, this Certificate with unredacted Statements is being filed with a Request for Information to Be Withheld from Public Inspection.

If you have questions, please contact: Susan Bahr, Esq., 10301 Strathmore Hall St Ste 421, North Bethesda, MD 20852, sbahr@bahrlaw.com, (301) 926-4930.

Name (signature): _____

Date: February 12, 2016

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STATEMENT #1
CPNI PROCEDURES

1. **To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without Customer approval, the Companies employ the following procedures.**

Waitsfield-Fayston Telephone Co., Inc. (WCVT) and Green Mountain Long Distance Service, Inc. (GMLD) (together referred to as "The Companies") occasionally market services to our customers in situations that do not require customer approval. For example, WCVT markets calling features to current local customers and GMLD markets long distance calling plans to its current customers.

2. **To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Companies employ the following procedures.**

The Companies occasionally use oral notice to obtain limited, one-time use of CPNI for customer telephone contacts for the duration of a call, in accordance with the CPNI rules. The Companies do not otherwise make use of CPNI in a way that requires notice and approval.

In addition, the Companies do not use, disclose or permit access to CPNI to market services that are not within a category of services to which the customer already subscribes. Thus, the Companies do no not send notifications or request corresponding approvals from their customers. The Companies do not use joint venture partners or independent contractors for marketing purposes.

3. **To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Companies employ the following procedures.**

As described above, CPNI is used only in limited instances, and in those instances, customer notice and approval is required before access is made to a customer's CPNI. The Companies provide

periodic in-house training sessions to personnel to ensure they are aware of when they are and are not authorized to disclose or use CPNI. Key senior staff have received training from outside consultants. The Companies have an express disciplinary process in place to handle any instances where improper use is made of CPNI; the process is described in the Companies' employee manuals. The process can include reprimand, retraining and separation from employment. The Companies maintain records of marketing campaigns, although they do not use CPNI for marketing campaigns. The Companies have a supervisory review process regarding compliance with the CPNI rules. They retain records of compliance as required by the rules, and sales personnel obtain supervisory approval of proposed requests for the use of CPNI.

4. **To ensure compliance with Section 64.2010 of the FCC's CPNI rules, concerning safeguards for disclosing CPNI, the Companies have employed the following procedures ever since Section 64.2010 went into effect.**

Telephone access to call detail information is provided only in accordance with the guidelines established in the CPNI rules. The Companies are working with customers to establish passwords and back-up authentication methods, if requested by the customer. Telephone access to non-call detail information is provided after the customer is authenticated. In-store access to CPNI is provided after a customer provides a valid photo ID. The Companies do not provide online access to CPNI without a user name and password. Whenever account information changes as specified in Section 64.2010, the Companies immediately notify the customer, via a letter mailed to the existing address of record (i.e., one that has been valid for 30 days as required by the rules).

5. **To ensure compliance with Section 64.2011 of the FCC's CPNI rules, concerning notifications of security breaches, the Companies employ the following procedures.**

All staff has been trained in procedures to follow to report breaches internally. If a breach occurs, it will be confirmed and the appropriate regulatory personnel are prepared to make the required notifications to the United States Secret Service, the Federal Bureau of Investigation, and the customer, as required and

permitted under Section 64.2011. Records of any such breaches and the corresponding notifications are maintained for at least two years.

STATEMENT #2
PROCESSES PRETEXTERS ARE USING TO ATTEMPT TO ACCESS CPNI

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STATEMENT #3
HOW CPNI IS PROTECTED

In addition to following all the procedures described herein and in the FCC's CPNI rules, other steps that the Companies take to ensure that CPNI is protected include:

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