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Elkhart Telephone Co., Inc.

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Annual 47 C.F.R. Section 64.2001 – 64.2011 CPNI Operating Procedures Compliance Statement EB Docket 06-36

The Operating Procedures Compliance Statement for ELKHART TELEPHONE COMPANY (the "Company") explains how the established operating procedures ensure the Company's compliance with the customer proprietary network information ("CPNI") rules in this subpart. All Company employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI.

Every employee of the Company has a duty to protect the confidentiality of CPNI, as defined in 47 U.S.C. § 222(h)(1). 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.

The service categories provided by the Company include local exchange telephone service and DSL access service. It is the Company's policy to not use CPNI for any sales or marketing purpose. 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.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used in accordance with Section 64.2005. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use the information only for such purpose and shall not use such information for any other purposes.

The Company has developed, through its operating procedures, extensive safeguards that have reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees are following procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact or a retail store visit.

A Company employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Company. The validation process must, at a minimum, include asking the person requesting non-call detail CPNI for the last four digits of the customer's social security number or driver's license number and only disclosing the non-call detail CPNI if the correct four digits are provided. No Company employee shall disclose CPNI to a person other than the customer unless the customer provides written authorization affirmatively requesting that the customer's CPNI be disclosed to that person. No Company employee shall disclose call detail information over the telephone. The customer will have to be present in a retail location and present valid photo ID in order to obtain call detail CPNI. If the customer requests, the Company can mail call detail information to the address of record. 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.

The Company holds periodic training sessions to train employees as to 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, information to employees relating to CPNI compliance.

Should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications and allow reasonable time for such modifications to be implemented. Under no circumstances will CPNI be used for any marketing purpose until after the Company has sent customers the notices required by 47 C.F.R. § 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI.

Sales personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Company will establish a system by which the status of a customer's CPNI approval can be clearly identified if the Company changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign. Upon such a change in Company policy, employees must add to the CPNI record a description of each such out-bound marketing campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. As specified in Section 64.2009(f) of the FCC's rules, the Company will notify the Commission by letter within (5) business days of any instance where the opt-in/opt-out mechanism have not worked.

As required by FCC 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.

Signed Trent D. Boaldin Date 2/16/2016
Trenton D. Boaldin, President

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

There were no actions taken against anyone by the Company during the 2015 calendar year.

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.

Signed Trent D. Boaldin Date 2/16/2016
Trenton D. Boaldin, President

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Annual 47 C.F.R. Section 64.2009(e) CPNI Certification
EB Docket 06-36

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

Date Filed: 2/17/2016

Name of company covered by this certification: Elkhart Telephone Company

Form 499 Filer ID: 806874

Name of signatory: Trenton D. Boaldin

Title of signatory: President

I, Trenton D. Boaldin, 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. Section 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 (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 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 Trent D. Boaldin