WWEST COMMUNICATIONS

Wahkiakum West
Telephone · Broadband

February 19, 2016

**BY ELECTRONIC COMMENT FILING SYSTEM**

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

Dear Ms. Dortch:

Re: EB Docket No. 06-36 –
Form 499 Filer ID: 802254
Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Filing
Due March 1, 2016

Pursuant to 47 C.F.R. § 64.2009(e) and Public Notice DA 16-127 (Enforcement Advisory No. 2016-01), dated February 5, 2016, on behalf of Western Wahkiakum County Telephone Company ("Company") accompanying this letter for filing with the Federal Communications Commission ("Commission") is an electronic original of the Company's annual 47 C.F.R. § 64.2009(e) CPNI compliance filing due March 1, 2016. The filing consists of a cover sheet and a copy of the Company's most recent compliance certificate and accompanying statement pursuant to Section 64.2009(e) of the Commission's rules and regulations.

Respectfully submitted,

Steven M. Appelo
President

Accompanying Documents

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**FEDERAL COMMUNICATIONS COMMISSION**

**EB DOCKET NO. 06-36**

**ANNUAL 47 C.F.R. § 2009(e) CPNI COMPLIANCE FILING**
**DUE MARCH 1, 2016**

**WESTERN WAHKIAKUM COUNTY TELEPHONE COMPANY**
**(FORM 499 FILER ID: 802254)**

**DATE: FEBRUARY 19, 2016**

**COMPLIANCE CERTIFICATE**
**PURSUANT TO SECTION 64.2009(e) OF THE**
**RULES AND REGULATIONS OF THE FEDERAL**
**COMMUNICATIONS COMMISSION, 47 C.F.R. § 64.2009(e)**

I, Steven M. Appelo, being of lawful age, state that I am President of Western Wahkiakum County Telephone Company, that I am authorized to execute this certificate as agent for Western Wahkiakum County Telephone Company, and that the facts set forth in this certificate are true to the best of my knowledge, information and belief.

On that basis and in that capacity, I state that I have personal knowledge that Western Wahkiakum County Telephone Company has established operating procedures that are adequate to ensure compliance by Western Wahkiakum County Telephone Company with the rules and regulations of the Federal Communications Commission set forth in 47 C.F.R. §§ 64.2001 through 64.2011.

Date: February 19, 2016.

WESTERN WAHKIAKUM COUNTY
TELEPHONE COMPANY

By _____
Steven M. Appelo
Its: President

**STATEMENT, PURSUANT TO 47 C.F.R. § 64.2009(e), OF**

**WESTERN WAHKIAKUM COUNTY TELEPHONE COMPANY ("COMPANY"),**

**ACCOMPANYING THE COMPANY'S COMPLIANCE CERTIFICATE, DATED FEBRUARY 19, 2016, PURSUANT TO 47 C.F.R. § 64.2009(e)**

The Company has established policy that the Company, its employees and agents shall comply fully with all applicable Federal and state statutes, rules, regulations and orders pertaining to the use of, access to, and disclosure of Customer Proprietary Network Information ("CPNI"), as defined in Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. § 222, and by Section 64.2003 of the rules and regulations of the Federal Communications Commission ("Commission"), 47 C.F.R. § 64.2003, as such definitions have been clarified by the Commission, and as defined in applicable state law and/or rules and regulations. The Company's policy (and/or operating procedures) may impose restrictions on the use of, access to, and/or disclosure of CPNI that are more stringent than those required by Federal or state law, rule, regulation or order. Violation of such policy (and/or operating procedures) by any employee of the Company is grounds for discipline, up to and including termination of employment.

The Company's operating procedures in furtherance of its above-mentioned policy include, but are not limited to, the following:

1. The Company does not engage in any outbound telemarketing.

2. Outbound print marketing, if any, that may be distributed by the Company by mail is addressed to all subscribers or customers within the applicable geographic area, zip code(s) and/or telephone number prefix(es), without regard to the specific services that the subscriber or customer receives, or does not receive, from the Company and/or the Company's affiliates. Such mailings, if they occur, do not use any CPNI and are addressed to the subscriber's or customer's billing name and billing address.[1]

3. None of the Company's affiliates is permitted to use any CPNI of the Company for any outbound telemarketing or outbound print marketing.

4. The Company does not use any CPNI for any inbound marketing of services that are not within a category of service (*i.e.*, local, interexchange, and CMRS) to which the customer already subscribes from the Company and/or one or more of the Company's affiliates, unless the caller, having first been properly authenticated as a person authorized to have access to the subject account, consents to the use of such CPNI for such purpose for the

[1] A customer's billing name, billing address and telephone number are not included within the Commission's definition of CPNI. *See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customary Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Order (DA 98-971), released May 21, 1998 (Chief, Common Carrier Bureau) at ¶¶ 8-9.

duration of such call in accordance with the procedures specified in Section 64.2008(f) of the Commission's rules.

5. The Company does not sell, or provide access to any third party to, any of the Company's CPNI for purposes of marketing the services of the Company or of any of its affiliates, other than as permitted with respect to the Company's affiliates pursuant to 4. above.

6. Except for CPNI made available to other telecommunications carriers pursuant to tariffed or detariffed billing and collection arrangements and billing and collection services provided pursuant thereto, the Company does not sell CPNI to any third-party for any purpose.

7. The Company, its employees and agents may make such other uses and disclosures of, and permit access to, CPNI as are permitted by applicable statute, rule, regulation or order. Such uses, disclosures or access may include those authorized by Section 222 of the Communications Act of 1934, as amended, by Section 64.2005 of the Commission's rules and by orders of the Commission, such as those pertaining to the authorized exchange of data among telecommunications carriers and preferred carrier freezes. The Company may disclose certain CPNI to third parties that provide services to the Company for uses authorized by Section 222 of the Communications Act of 1934, as amended, such as assistance with the preparation of the Company's monthly bills to its customers, but the Company does not make such disclosure to independent contractors for marketing purposes.

8. Except as set forth above, the Company does not provide any individually identifiable CPNI to any governmental entity, or to any other third party (except the subscriber's agent), other than pursuant to subpoena or other lawful process or with the subscriber's prior written consent.

9. The Company does not disclose CPNI based on an in-store visit, customer-initiated telephone contact, or online access except in accordance with the following:[2]

    (a) As a result of a person visiting a Company customer service center and presenting to the Company or the Company's agent a facially valid, government-issued photo ID matching the subscriber's account information for the relevant account; or

    (b) As a result of a person initiating contact by telephone with a Company customer service center,[3] in accordance with the following:

[2] The Company's practices and procedures described in this Item 9 are those in effect on the date of the certification that this statement accompanies.

[3] As used in this Item 9.(b), the terms "customer service center" and "customer service representative" also include certain Company representatives involved in the billing and/or collection of customer accounts.

(i) For CPNI consisting of "call detail information," as defined in 47 C.F.R. § 64.2003(d), in accordance with any one or more of the following:

*(a)* Upon *(i)* the person who is requesting "call detail information" identifying himself or herself to be the subscriber (or the subscriber's duly authorized agent), *(ii)* the Company's customer service representative confirming by the Company's records that the name furnished by such person is the same as the name of a person authorized to have access to the subject account and *(iii)* such person furnishing a pre-established password without being prompted by the Company's customer service representative asking for "readily available biographic information," as defined in 47 C.F.R. § 64.2003(m), or "account information," as defined in 47 C.F.R. § 64.2003(a); or

*(b)* Upon *(i)* the person who is requesting "call detail information" representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and providing the Company's customer service representative with appropriate identifying information (such as social security number or requested portion thereof, driver's license number, or mother's maiden name) and *(ii)* the Company's customer service representative confirming by the Company's records that the name furnished by such person is the same as the name of a person authorized to have access to the subject account, by then either (1) calling such person back at the telephone number to which the relevant "call detail information" pertains or at the lead telephone number (for billing purposes) of the telephone number to which the relevant "call detail information" pertains, or (2) by sending the requested "call detail information" to the subscriber's address of record; or

*(c)* If the person who is requesting "call detail information" does not furnish a pre-established password without being prompted by the Company's customer service representative asking for "readily available biographic information," as defined in 47 C.F.R. § 64.2003(m), or "account

information," as defined in 47 C.F.R. § 64.2003(a), but *(i)* does identify himself or herself in accordance with subparagraph *(b)* immediately preceding, including the Company's customer service representative confirming by the Company's records that the name furnished by such person is the same as the name of a person authorized to have access to the subject account, and *(ii)* supplies all of the "call detail information" necessary for the Company's customer service representative to respond to such person's inquiry, without divulging any additional "call detail information" or other CPNI, by responding to such person's inquiry without divulging any additional "call detail information;" or

*(d)* If the person who is requesting "call detail information" represents himself or herself to be the authorized agent of a business customer and the Company's customer service representative is able to confirm by the Company's records that a person so named is an authorized agent of the business customer, but such person is unable to provide the Company's customer service representative with appropriate identifying information (such as social security number or required portion thereof, driver's license number, or mother's maiden name), or (*iii*) such person is unable to provide a pre-established password without being prompted by the Company's customer service representative asking for "readily available biographic information," as defined in 47 C.F.R. § 64.2003(m), or "account information," as defined in 47 C.F.R. § 64.2003(a), then either (1) by calling such person back at the telephone number to which the relevant "call detail information" pertains or at the lead telephone number (for billing purposes) of the telephone number to which the relevant "call detail information" pertains and confirming such person's identity by the use of appropriate identifying information (such as social security number or requested portion thereof, driver's license number, or mother's maiden name), or (2) by sending the requested "call detail information" to the subscriber's address of record; or

(ii) For CPNI consisting of other than "call detail information," as defined in 47 C.F.R. § 64.2003(d), in accordance with one or more of the following:

*(a)* Upon the person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and providing the Company's customer service representative with either *(i)* a pre-established password without being prompted by the Company's customer service representative asking for "readily available biographic information," as defined in 47 C.F.R. § 64.2003(m), or "account information," as defined in 47 C.F.R. § 64.2003(a) or *(ii)* correct answers to back-up security questions if they have been established for the subject account, or *(iii)* appropriate identifying information (such as social security number or requested portion thereof, driver's license number, or mother's maiden name) and the Company's customer service representative confirming by the Company's records that the name furnished by such person is the same as the name of a person authorized to have access to the subject account; or

*(b)* Upon *(i)* the person representing himself or herself to be the subscriber (or the subscriber's duly authorized agent) and *(ii)* the Company's customer service representative confirming by the Company's records that the name furnished by such person is the same as the name of a person authorized to have access to the subject account, but either (i) no password has been established for the subject account and the Company's customer service representative is unable to confirm such person's identity by appropriate identifying information (such as social security number or requested portion thereof, driver's license number, or mother's maiden name), or (ii) if such a password has been established, such person is unable to provide such password without being prompted by the Company's customer service representative asking for "readily available biographic information," as defined in 47 C.F.R. § 64.2003(m), or "account information," as defined in 47 C.F.R. § 64.2003(a), and either no back-up security questions have been established for the account, or, if such back-up

security questions have been established, such person is unable to answer them correctly, by then either (1) calling such person back at the telephone number to which the requested CPNI pertains or at the lead telephone number (for billing purposes) of the telephone number to which the requested CPNI pertains, or (2) by sending the requested CPNI to the subscriber's address of record; or

*(c)* If the person represents himself or herself to be the authorized agent of a business customer but the Company's customer service representative is unable to confirm by the Company's records that a person so named is an authorized agent of the business customer, then by either (1) calling such person back at the primary telephone number for the relevant business subscriber or (2) sending the requested CPNI to the subscriber's address of record; or

(c) As a result of the person establishing an online, e-billing account with the Company or with an affiliate of the Company that performs billing on the Company's behalf, in accordance with procedures prescribed by the Company or such billing affiliate, and the said e-billing account being accessed by means of the user name and password associated with that e-billing account being correctly input into the online e-billing system.

10. Company personnel receive ongoing training as to when they are and are not authorized to use CPNI.

11. In the event of a breach of any customer's CPNI, the procedures set forth in 47 C.F.R. § 64.2011 are to be observed. As used in this Item 11, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

12. Customers are to be notified whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. This notification may be through a Company-originated voicemail or text message to the telephone number of record, or by mail to the address of record, but is not to reveal the changed information or be sent to the new account information.

During the calendar year ended December 31, 2015, the Company did not take any action against any data broker in connection with access to CPNI.

During the calendar year ended December 31, 2015, the Company did not receive any customer complaints concerning the unauthorized release of CPNI.

During the calendar year ended December 31, 2015, the Company did not acquire first-hand any information that it has identified as being information with respect to the processes pretexters are using to attempt to access CPNI.

WESTERN WAHKIAKUM COUNTY
TELEPHONE COMPANY