Alexicon
Evaluate – Innovate – Advocate

February 22, 2016

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Wamego Telecommunications Company, Inc. (820079), please find the attached annual CPNI certifications and accompanying statements which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (918) 376-9901.

Sincerely,

Dion Nero
Authorized Representative of:
Wamego Telecommunications Company, Inc.

DN/dk/cb
Attachment

cc: Jeff Wick

ANNUAL 47 C.F.R. SECTION 64.2009(E)

CPNI CERTIFICATION FOR YEAR 2015

EB DOCKET 06-36

WAMEGO TELECOMMUNCATIONS CO., INC.

Filed - FEBRUARY 20, 2016

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)

1. Date Filed: February 20, 2016

2. Name of company(s) covered by this certification: Wamego Telecommunications Co, Inc.

3. Form 499 Filer ID: **820079**

4. Name of signatory: Jeff Wick

5. Title of signatory: President

6. Certification:

I, Jeff Wick, 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 (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.

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. Section 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 _____
Jeff Wick

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

Annual 47 C.F.R. Section 64.2009(e) Customer Proprietary Network Information (CPNI)
Operating Procedures Compliance Statement
EB Docket 06-36

This *Operating Procedures Compliance Statement* for Wamego Telecommunications Co., Inc. (the "Company") explains 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.

A. Notice to customers of their right to restrict use of, disclosure of, and access to their CPNI is provided prior to solicitation for customer approval

B. All Company employees will be trained annually on the Operating Procedures for properly safeguarding all CPNI. The Company holds occasional training sessions for employees reviewing when they are and are not authorized to use or disclose CPNI, followed by a supervisory review process regarding compliance with CPNI rules by those employees. The Company also sends, via company email or other methods the Company choose to employ, information to employees relating to CPNI compliance.

C. Every employee of the Company has a duty to protect the confidentiality of CPNI. 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.

D. The Company maintains records of our own and our affiliates' sales and marketing endeavors that use customer CPNI, including instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. Our records describe the event, the specific CPNI that was used in the event, and what products and services were offered as a part of the marketing and sales event. The Company retains records for a minimum of one year.

E. The Company has established a review process for ensuring compliance with CPNI rules related to marketing activities. The Company's customer service representatives and marketing personnel obtain approval of requests for CPNI information. 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.

F. For safeguarding CPNI, the Company employs reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Company employees follow procedures designed to authenticate all customers prior to disclosing CPNI based on customer-initiated telephone contact or in-person visits.

G. 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.

H. In establishing a password, the Company authenticates the customer without the use of readily available biographical information, or account information. The Company has a back-up plan in the event of a lost or forgotten password, however if a customer cannot provide the correct password or the correct response for the back-up authentication method, the customer must establish a new password.

I. As required by 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 _____ Date 2-20-16
Jeff Wick

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 _____ Date 02-20-16
Jeff Wick