Annual 47 C.F.R. § 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 22, 2016
2. Name of company(s) covered by this certification: Table Top Telephone Company, Inc.
3. Form 499 Filer ID: 809626
4. Name of signatory: Matthew J. Boos
5. Title of signatory: Secretary
6. Certification:

I, Matthew J. Boos, 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, 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. § 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 _____
Matthew J. Boos
Secretary, Table Top Telephone Company, Inc.

Attachments: Accompanying Statement explaining CPNI procedures

Table Top Telephone Company, Inc.
STATEMENT OF COMPLIANCE WITH
47 U.S.C. § 222 AND 47 C.F.R. § 64.2001, *et seq.*

In accordance with 47 C.F.R. Section 64.2009(e), Table Top Telephone Company, Inc. ("Table Top") hereby provides a statement of how its operating procedures ensure compliance with the FCC's Customer Proprietary Network Information ("CPNI") Rules, as reflected in 47 U.S.C. Section 222, 47 C.F.R. Section 64.2001, *et seq.*, and in the FCC orders interpreting these regulations. Table Top takes customer privacy issues very seriously, and Table Top has taken the steps necessary to ensure that its customers' CPNI are appropriately protected under federal law.

As set forth below, Table Top recognizes its general duty to protect CPNI, and Table Top understands its customers' rights to restrict the manner in which CPNI is used and disclosed. Table Top's policies are compliant with the authentication requirements, password protections, notice requirements, and other elements of FCC 07-22.

I. Table Top Recognizes its Duty to Protect CPNI and Other Confidential and Proprietary Information.

Table Top's management has reviewed the obligations imposed under the CPNI Rules, and the definition of CPNI provided therein. Table Top has structured its practices to ensure compliance with these directives, and to create an awareness within the company about how CPNI is used, and how it might be better protected. Table Top is proud of its long history of providing reliable, trustworthy customer service. Table Top remains vigilant in detecting any possible attempts to obtain unauthorized access to CPNI. Table Top periodically reviews its data security and CPNI use and disclosure policies to ensure that they are appropriately tailored to protect against the efforts of pretexters, data brokers, and other unauthorized individuals to obtain access to customers' CPNI.

Table Top acknowledges its duty under federal law to protect confidential and proprietary information received from other telecommunications carriers, equipment manufacturers, and customers. *See* 47 U.S.C. § 222(a). Table Top further understands that it cannot use or disclose CPNI without customer consent, unless specific statutory or FCC-endorsed exceptions apply. Table Top's use of CPNI is limited to what is permitted under the "total services approach" (as defined in 47 C.F.R. Section 64.2005) and what is permitted under established exceptions where customer consent is not required.

II. Table Top Has Appropriately Limited Access to CPNI.

As set forth below, Tale Top's policies limit access to CPNI in accordance with the language and the spirit of the CPNI Rules.

A. Restrictions on Employee Access to CPNI.

Table Top's employees are only granted access to CPNI to the extent that such access is necessary to perform telephone company functions that are within the scope of those employees' duties with Table Top. Any employees with access to CPNI operate under policies that prohibit disclosure of the information except as necessary to perform telephone company functions for which access to CPNI is necessary and appropriate under the CPNI Rules. Electronic documents containing CPNI are password-protected in Table Top's system, and written documents containing CPNI may only be accessed by authorized personnel. Written documents containing CPNI are kept in secure, locked files when not in use.

B. Procedures Governing Customer Access to CPNI.

Table Top has tailored its practices for providing customer access to CPNI to be consistent with the CPNI rules, including the directives in FCC 07-22. CPNI may be provided to the customer of record and/or any other individual that has been authorized by the customer of record to receive CPNI. Table Top will only disclose CPNI to an individual authorized to view CPNI after authenticating the individual. Different authentication procedures are employed depending on the manner in which the individual contacts the company, and other factors.

Table Top follows special authentication procedures with regard to the release of "call detail" information. Call detail is a form of CPNI that includes any information pertaining to the transmission of a customer's telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call. Call detail will only be released over the phone in a customer-initiated call if the customer can provide a pre-established password. Table Top has implemented a password system in compliance with FCC 07-22. Passwords were not established using "readily obtainable biographical information." Table Top has also established a backup means of authentication using a "secure question" and "secure answer" for customers who have lost or forgotten their passwords. The same password system has been put in place to permit online access as a prerequisite to customers' obtaining online access to account information, including CPNI.

For customers who do not have passwords or who have lost their passwords and are unable to complete the "secure question" and "secure answer" process, call detail information can be obtained in one of three ways: (1) by requesting that call detail be mailed to the address of record; (2) through a Table Top-initiated call to the telephone number of record; or (3) by appearing in person at a Ponderosa business office and presenting a valid, United States government-issued photo identification. Acceptable forms of identification include United States drivers licenses, passports, and military identifications.

Table Top customer service representatives are trained not to release call detail to customers except in the ways specified above, as permitted under the CPNI Rules. For business customers for which Table Top has a dedicated account representative, Table Top may contract to establish procedures that deviate from those applicable to customers generally. These deviations are subject to management approval, and require mutual agreement between Table Top and the affected customer or customers.

III. Table Top Informs Customers of Account Changes in the Manner Prescribed by the CPNI Rules.

Table Top has implemented the customer notice provisions in FCC 07-22. In accordance with those procedures, Table Top will notify customers immediately of any account changes, including changes in passwords, backup "secure questions" or "secure answers," online account information, address of record. These customer notices are provided either by United States mail to the address of record, through a voice mail to the number of record, or to a pre-arranged customer e-mail address. If an address has been changed within 30 days, the notice will be sent to the address on record prior to the address change.

IV. Table Top Follows the Correct Procedures for Reporting and Informing Customers of Unauthorized Disclosures of CPNI.

Table Top has implemented the notice and reporting requirements in FCC 07-22 governing instances of unauthorized disclosures of CPNI. Table Top will report any incident where a security breach results in a customer's CPNI being disclosed to a third party without the customer's authorization. Where a reportable breach occurs, Table Top will send an electronic notification through the central reporting facility to the United States Secret Service and the Federal Bureau of Investigation. The notification will contain each of the elements required under FCC 07-22. The reporting will be accomplished through the FCC's link to the reporting facility at http://www.fcc.gov/eb/cpni. Table Top will notify law enforcement in this manner within seven days after Table Top has determined that a reportable breach took place.

Table Top will not notify any of its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until seven days after it has completed the process of notifying law enforcement. If Table Top believes that there is an extraordinarily urgent need to notify any class of affected customers sooner in order to avoid immediate and irreparable harm, it shall so indicate in its notification to law enforcement and may proceed to immediately notify its affected customers only after consultation with law enforcement. Table Top shall cooperate with the relevant investigating agency's request to minimize any adverse effects of a customer notification.

Table Top will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to law enforcement, and all notifications made to customers. Records of this sort will include, if available: (1) the dates of discovery

and notification; (2) a detailed description of the CPNI that was the subject of the breach; and (3) the circumstances surrounding the breach. Table Top will retain the record for a minimum of two years.

V. Employee Discipline, Training, and the Development of a CPNI Compliance Manual.

Table Top provides training to employees on the proper procedures for use and disclosure of CPNI, and on how to preserve the confidentiality of CPNI. Table Top carefully defines for employees who is authorized to gain access to CPNI, and under what circumstances such access is permitted. Each employee is required to sign a certification stating that they understand their responsibility to protect confidential customer information. Any infractions regarding the use or disclosure of CPNI are taken very seriously at Table Top. A record of any such infractions may subject an employee involved to disciplinary action, up to and including termination of employment.