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

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

1. Date: February 22, 2016
2. Name of company covered by this certification: Circle Telephone & Electric, LLC
3. Form 499 Filer ID: 814731
4. Name of signatory: David Masephol
5. Title of signatory: President
6. Certification:

I, David Masephol, 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, 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., proceeding 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 misrepresentation to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed David Masephol

Attachment: CTE CPNI Compliance Policy

Circle Telephone & Electric, LLC

CPNI Compliance Policy

Circle Telephone & Electric, LLC (CTE) is a rural local exchange carrier that provides local telecommunication service to the residents of Circle, a tribal community in interior Alaska. CTE is a Feature Group C (FGC) non-equal access office with 66 access lines.

CTE utilizes a Class 5 switch to provide service to its customers. The Class 5 switch used is not capable of measuring or tracking call data. Because of this limitation the only CPNI data available to CTE is Non-Call Detail CPNI.

AT&T, the long-distance carrier of last resort and only other telecommunications provider in CTE's serving area, captures the long-distance call data when the call reaches AT&T's equipment. To enable AT&T to bill the long-distance usage, CTE provides AT&T with the customer's name, address and telephone number when a new line is installed.

In addition to AT&T, CTE provides the local directory service provider with the customer's name, address and telephone number.

To ensure compliance with CPNI regulation internally, a password known only by the owners of the company is used to access CTE's customer billing database. In addition to the owners, CTE's accountant records the local service billing information each month. To ensure compliance with CPNI regulation, CTE's accountant has been trained in CPNI regulation and has signed a document ensuring her knowledge of and compliance to CPNI regulation.