

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

Annual 64.2009(e) CPNI Certification for **2015**

Date filed: **February 29, 2016**

Name of Company covered by this certification: **Project Mutual Telephone Cooperative Association, Inc.**

Form 499 Filer ID: **802362**

Name of Signatory: **Rick Harder**

Title of Signatory: **CFO/Treasurer**

I, Rick Harder, 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 set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). If affirmative: (provide summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.)

Signed:   
Rick Harder CFO/Treasurer

Attachments: **Accompanying Statement explaining CPNI procedures**

# Project Mutual Telephone Coop Assoc, Inc. (PMT)

PO Box 366

Rupert, Idaho 83350

## PMT - Customer Proprietary Network Information Policy

CPNI Definition: (A) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. Practically speaking, CPNI includes information such as the phone numbers called by a customer; the frequency, duration, and timing of such calls; and any services purchased by the consumer, such as call waiting.

### **As a matter of Policy,**

PMT prohibits the release of CPNI to customers during customer initiated telephone contact, unless the customer can be authenticated over the phone, by providing the last four digits of the SS#, provide a password, or provide an answer to a pre established question. When the customer cannot be authenticated, we can offer to call the customer back at the phone number of record or mail the information to the address of record to fulfill the request. The other option the customer has is to come into a PMT office or store with a valid ID to discuss their request.

PMT does not allow on-line access to account information, unless they establish a pin number.

PMT notifies the customer when the address of record / password is changed.

PMT will notify law enforcement no later than seven days after a reasonable determination of a breach, by sending electronic notification to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI). PMT will wait until seven business days have passed after the notification of the agencies before notifying the customer. If PMT perceives a need to immediately notify the customer, it may do so after consultation with the investigative agencies.

PMT will review and certify our CPNI policy and activity on an annual basis.

All PMT personnel are trained annually on the company policy regarding CPNI. Copies of the training information have been maintained in the CPNI manual.

Disciplinary policy is in place and has been communicated to employees.

PMT did not receive any consumer complaints in 2015 regarding the unauthorized release of CPNI.

PMT did not take any action against data brokers in 2015.

PMT has established dedicated business contacts for our business customers.

PMT will not disclose customer CPNI to joint venture partners or independent contractors for the purposes of marketing communications related services, unless we obtain opt-in consent from a customer.

**Certification Year:            2015**