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February 29, 2016

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual Certification of TDS Telecommunications Corporation

Dear Ms. Dortch:

TDS Telecommunications Corporation, by its attorneys and on behalf of the wholly-owned subsidiaries identified in this submission (collectively, "TDS Telecom"), hereby files its annual CPNI certification pursuant to the requirements of Section 64.2009(e) of the Commission's rules.

This submission has been redacted for public inspection, as permitted by the *Report and Order* released by the Commission in the above-referenced docket on April 2, 2007. *See Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927, 6954 n.167 (2007). A confidential, unredacted version of this submission will be filed today by hand.

Any questions concerning this submission should be addressed to the undersigned.

Respectfully submitted,

/s/ Yaron Dori
Yaron Dori
Counsel for TDS Telecom

Enclosure

REDACTED FOR PUBLIC INSPECTION

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2015 Calendar Year
EB Docket No. 06-36

Companies covered by this certification: Wholly owned telecommunications subsidiaries of TDS Telecommunications Corporation as of December 31, 2015.[1]

Form 499 Filer IDs: Please see the attached list

Signatory Name: James W. Butman

Signatory Title: Group President of Marketing, Sales and Customer Operations, TDS Telecommunications Corporation

I, James W. Butman, certify that I am an officer of TDS Telecommunications Corporation, and acting as an agent of the company, that I have personal knowledge that the wholly owned telecommunication subsidiaries (Companies) have 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 Companies' procedures ensure compliance with the requirements 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 in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: James W. Butman

Date Signed: 2/24/2016

[1] TDS Telecommunications Corporation divested six of its wholly owned telecommunications subsidiaries during 2015. *See* FCC Public Notices, "Notice of Non-Streamlined Domestic Section 214 Application Granted," DA 15-242 (rel. February 23, 2015) and "Notice of Domestic Section 214 Authorization Granted," DA 15-1219 (rel. October 26, 2015). Accordingly, this certification covers the divested companies (Barnardsville Telephone Company, Saluda Mountain Telephone Company, Service Telephone Company, Wyandotte Telephone Company, Decatur Telephone Company, and Cleveland County Telephone Company) only for the portion of 2015 during which TDS Telecommunications Corporation owned them.

TDS Telecom Statement Explaining CPNI Procedures

This statement accompanies the annual certification of TDS Telecommunications Corporation ("TDS Telecom" or the "Company") as required 47 C.F.R. § 64.2009(e). It describes TDS Telecom's operating practices, procedures, systems, processes, and controls designed to ensure compliance with the Commission's CPNI rules.

A. Approval Required for Use of CPNI

Consistent with the Commission's rules, TDS Telecom uses CPNI to market service offerings to customers that are within the category of service to which the customer already subscribes ("Total Service Approach") or to market services formerly known as adjunct-to-basic services, or with prior customer approval. As explained more fully herein, TDS Telecom informs customers of their right to opt-out of the company's use of their CPNI under specified circumstances predominately through a written notice, but in limited circumstances also through a one-time oral permission mechanism.

TDS Telecom's systems are designed to provide customers with notice of their opt-out rights through a written notice that is incorporated into a Welcome Letter that is transmitted to every new customer when service to that new customer is initiated. TDS Telecom's processes are designed to provide subsequent written notice of such opt-out rights through a bill insert sent to existing customers every 22 months.

Welcome Letters are cued for delivery by TDS Telecom service advisors to customers in one of two ways — through a manual process or through an automated process. In an effort to ensure that Welcome Letters are generated for all customers, TDS Telecom's internal compliance practice is for a TDS Telecom employee to each business day review a report that identifies any new customers who were not sent a Welcome Letter and to take action to ensure that a Welcome Letter is queued for delivery to any new customer identified in this report, as appropriate.

The written opt-out notice provided in the Welcome Letter and in bill inserts is designed to include information regarding a toll-free IVR system available to customers 24 hours-a-day, seven days-a-week to record their opt-out election. The majority of subscriber opt-outs are obtained through this IVR system; however, some customers contact customer service advisors to effectuate their opt-out election. In both cases, the customer records database is designed to retain the opt-out requests unless the customer subsequently elects to change his or her opt-out status. There are controls in place that are designed to ensure that opt-out requests recorded in the customer records database are honored.

B. Safeguards for CPNI Use

TDS Telecom's systems are designed to, where required, enable company personnel to determine a customer's opt out status prior to the use of his or her CPNI. For in-bound calls from customers, the system is designed to provide TDS Telecom's customer sales advisors with the incoming caller's opt-out status or the ability to retrieve that information from the customer records database. When marketing lists for outbound campaigns are created, TDS Telecom's processes are designed so as to enable company personnel to consult the customer records database so that only those customers who have not opted-out are included in marketing lists.

TDS Telecom educates and trains its employees regarding the appropriate use and disclosure of CPNI. Company policies, including CPNI policies, are communicated in writing to all employees when they join TDS Telecom. After reviewing these policies, employees must acknowledge that they have read and understand them. In addition, employees are required to complete CPNI training soon after they are hired. CPNI training is reinforced from time to time; in 2015, employees completed a privacy refresher course that included CPNI components. In addition, employees who function in a customer advisory role such as customer service advisors are provided further guidance on the proper handling of CPNI via procedures. Adherence to procedure is tested periodically through call monitoring, and where issues are identified they are escalated and resolved, as appropriate.

Under TDS Telecom's practices, sales personnel must obtain approval from a supervisor trained in the CPNI marketing rules before any sales or marketing campaigns may use CPNI outside of the Total Service Approach. If the sales personnel receive approval, they may obtain a marketing list, which under TDS Telecom's practices may identify only those customers who have not opted out of having their CPNI used outside of the Total Service Approach for marketing purposes. If a marketing list is created for a campaign that relies on the use of CPNI outside of the Total Service Approach, it is TDS Telecom's policy that the list be retained for a minimum of one year.

C. Safeguards Against CPNI Disclosure

TDS Telecom takes reasonable measures to discover and protect against attempts by unauthorized third parties to gain access to customer CPNI by securing its network, using password systems, using notification systems, and monitoring for unauthorized access.

[redacted]

It TDS Telecom's practice to authenticate in-bound callers using either a password or account-based method. If a caller wishes to discuss sensitive information including call detail records, procedures require password authentication. Otherwise, in accordance with procedures, sales advisors may use account-based authentication to discuss less sensitive information. Adherence to these procedures is tested by through call monitoring, and where issues are identified they are escalated and resolved, as appropriate.

The password systems used for in-bound calls are a Personal Identification Number ("PIN") -based system and a secret question and answer system. When customers call TDS Telecom customer service lines, automated call routing applications ask customers to authenticate themselves with a PIN. If a customer successfully completes that authentication, the customer's account information is routed along with the call to the advisor so that the advisor is aware that the customer was authenticated. If the routing information does not reflect authentication, TDS Telecom procedure calls for the advisor to authenticate the customer by verbally requesting the PIN or secret answer. To validate either the PIN or secret answer, advisors enter that information into the system, which either confirms that the correct information was entered or relays that it was not. The system specifies whether a password is assigned to the account but does not display the actual PIN or secret answer.

It is TDS Telecom's practice to notify customers whenever a password, online account, or address of record is created or changed on an existing account. Notifications are triggered systematically at the database level when the change is made. The notifications are completed in a timely fashion using one of three delivery methods (1) an e-mail to the e-mail address of record, (2) an automated message to the telephone number of record, or (3) postal mail to the billing address of record. As required by 47 C.F.R. § 64.2010(f), notifications do not reveal the changed information. To test the notification system, a sample of customer change requests is periodically traced through the systems to validate that the appropriate notifications were completed.

D. Notification of CPNI Breaches

TDS Telecom maintains processes and a system through which any employee can report a possible privacy event, including but not limited to unauthorized access to or use of CPNI. If an employee reports that a CPNI breach may have occurred, or if a potential breach is detected through the monitoring processes discussed above, TDS Telecom employees are instructed to record information about the event in a database so that the event can be investigated. Compliance experts then review the reported issue to assess whether a breach may have occurred. If a breach were to occur, TDS Telecom's practice requires that breach to be reported to law enforcement and to the customer in accordance with the Commission's rules.

It is TDS Telecom's practice to maintain its records of any breaches reported for at least two years.

State	TDS Entity	499 Filer ID
AL	Butler Telephone Company	806589
AL	Oakman Telephone Company	806580
AL	Peoples Telephone Company	806631
AR	Cleveland County Telephone Co.	805440
AR	Decatur Telephone Company	805443
AZ	Arizona Telephone Company	805434
AZ	Southwestern Telephone Company	805377
CA	Happy Valley Telephone Company	805449
CA	Hornitos Telephone Company	805455
CA	Winterhaven Telephone Company	805485
CO	Delta County Tele-Comm, Inc.	805446
CO	Strasburg Telephone Company	805479
FL	Quincy Telephone Company – FL	806583
GA	Blue Ridge Telephone Company	806634
GA	Camden Telephone & Telegraph Co. - GA	806823
GA	Nelson-Ball Ground Telephone Co.	802134
GA	Quincy Telephone Company – GA	806583
ID	Potlatch Telephone Company	805473
IN	Camden Telephone Company – IN	802068
IN	Communications Corp. of Indiana	806559
IN	Comm. Corp. of Southern Indiana	806556
IN	Home Telco of Pittsboro	806550
IN	Home Telephone Co. – Waldron	806553
IN	Merchants & Farmers Telephone Co.	809001
IN	S & W Telephone Company, Inc.	801558
IN	Tipton Telephone Company	804819
IN	Tri-County Telephone Company	801264
IN	West Point Telephone Company, Inc.	809790
KY	Leslie County Telephone Company	806619
KY	Lewisport Telephone Company	806625
KY	Salem Telephone Company	806622
ME	Cobbosseecontee Telephone Co.	801201
ME	Hampden Telephone Company	803232
ME	Hartland & St. Albans Telephone	806802
ME	Somerset Telephone Company	806799
ME	The Island Telephone Company	806820
ME	Warren Telephone Company	806787
ME	West Penobscot Telephone Company	806784
MI	Chatham Telephone Company	806523
MI	Communications Corp. of Michigan	806526
MI	Island Telephone Company	806529
MI	Shiawassee Telephone Company	806532
MI	Wolverine Telephone Company	806535
MN	Arvig Telephone Company	806766
MN	Bridge Water Telephone Company	804465
MN	KMP Telephone Company	805585
MN	Mid-State Telephone Company	805585
MN	Winsted Telephone Company	806409
MS	Calhoun City Telephone Company	806637
MS	Myrtle Telephone Company	805866
MS	Southeast Mississippi Tel	806577
NC	Barnardsville Telephone Company	806562
NC	Saluda Mountain Telephone Co.	806616
NC	Service Telephone Company	806601

State	TDS Entity	499 Filer ID
NH	Contoocook Valley Telephone Co.	808275
NH	Hollis Telephone Company	809570
NH	Kearsarge Telephone Company	806796
NH	Merrimack County Telephone Co.	808275
NH	Wilton Telephone Company	809034
NH	Union Telephone Company	801576
NY	Deposit Telephone Company	801840
NY	Edwards Telephone Company, Inc.	806781
NY	Oriskany Falls Telephone Company	806814
NY	Port Byron Telephone Company	806817
NY	Township Telephone Company, Inc.	808425
NY	Vernon Telephone Company	809218
OH	Arcadia Telephone Company	806544
OH	Continental Telephone Company	806541
OH	Little Miami Communications Corp.	806547
OH	Oakwood Telephone Company	806538
OH	Vanlue Telephone Company	808419
OK	Mid-America Telephone Company	805461
OK	Oklahoma Communication Systems	805467
OK	Wyandotte Telephone Company	805488
OR	Asotin Telephone Company – OR	805437
PA	Mahoney & Mahantango Tel. Co.	806808
PA	Sugar Valley Telephone Company	806775
SC	McClellanville Telephone Company	806586
SC	Norway Telephone Company	806574
SC	St. Stephen Telephone Company	806592
SC	Williston Telephone Company	806598
TN	Concord Telephone Exchange Inc.	806604
TN	Humphreys County Telephone Co.	806565
TN	Tellico Telephone Company	806613
TN	Tennessee Telephone Company	806610
VA	Amelia Telephone Company	806607
VA	New Castle Telephone Company	806628
VA	Virginia Telephone Company	806568
VT	Ludlow Telephone Company	806805
VT	Northfield Telephone Company	806793
VT	Perkinsville Telephone Company	806790
WA	Asotin Telephone Company – WA	805437
WA	Lewis River Telephone Company	807207
WA	McDaniel Telephone Company	804768
WI	B. B. & W. Telephone Company	805569
WI	Badger Telecom, Inc.	805563
WI	Black Earth Telephone Company	805560
WI	Bonduel Telephone Company	805566
WI	Central State Telephone Company	805572
WI	Dickeyville Telephone Company	807810
WI	Eastcoast Telecom, Inc.	805575
WI	Farmers Telephone Company	807813
WI	Grantland Telephone Company	805578
WI	Mid-Plains Telephone Company	806862
WI	Midway Telephone Company	805581
WI	Mosinee Telephone Company	808410
WI	Mt. Vernon Telephone Company	805584
WI	Riverside Telecom, Inc.	805587

State	TDS Entity	499 Filer ID
WI	Scandinavia Telephone Company	805590
WI	Southeast Telephone Company	808374
WI	State Long Distance Telephone Co.	801561
WI	Stockbridge & Sherwood Telephone	805593
WI	Tenney Telephone Company	805596
WI	Utelco, Inc.	801945

State	TDS Entity	499 Filer ID
WI	Waunakee Telephone Company	805602
CLEC	TDS Metrocom, LLC	817212
CLEC	US Link, Inc.	809008
	TDS Long Distance Corporation	820658