Northland Communications
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 26, 2008

Name of company covered by this certification: Northland Telephone Systems

Form 499 Filer ID: 809140

Name of signatory: Thomas I Ellis

Title of signatory: Secretary

I, Thomas I. Ellis, 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).

Signed Thm I Ell

NORTHLAND TELEPHONE SYSTEMS
STATEMENT OF COMPANY POLICY

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of Northland Telephone Systems.

Northland Telephone Systems (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of 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. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

! Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.

! CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.

! Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.

Northland Communications

STATEMENT OF COMPANY POLICY AND CPNI OPERATING GUIDELINES

When referred to in the Guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of Northland Communications.

These Operating Guidelines relating to Customer Proprietary Network Information ("CPNI") are intended to ensure the compliance by Northland Communications (the "Company") with the Communications Act of 1934, as amended, and related regulations regarding CPNI that have been adopted by the Federal Communications Commission ("FCC"). Accordingly, from time to time, these guidelines may change based on changes in the governing law or FCC regulations.

Northland Communications has a duty to protect the confidential Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, these CPNI Operating Guidelines shall be followed by all employees and agents of the Company.

CPNI, according to federal law, is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of the Company, and that is made available to the Company by the customer solely by virtue of the Company-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of the Company. This type of information includes personal information such as: the telephone numbers called by a customer; the length of phone calls; and services purchased by a customer, such as call waiting.

Federal law also contemplates data referred to as "customer information" and "subscriber list information." These types of data do not involve personal, individually-identifiable information. Aggregate customer information is data that relates to a group or category of customers from which individual customer identities and characteristics have been removed; subscriber list information is data such as subscriber names, addresses, and telephone numbers. The Company's Operating Guidelines address only federal regulations that are applicable to CPNI.

The Company acknowledges that:

(1) Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.

(2) CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the

provision of that service, and may not be used for any otherwise unrelated marketing efforts.

(3) Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released ***only*** in the circumstances as set forth in these CPNI Operating Guidelines.

The Company shall take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company shall properly authenticate a customer prior to disclosing CPNI based on customer-initiated telephone contact, online account access, or an in-store visit.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 CFR 64.2009, employees will be subject to disciplinary review for violation of the policies set forth herein. Employees should contact their supervisor if they have any questions or require additional information.

Important Definitions

Account Information. "Account information" is information that is specifically connected to the customer's service relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.

Address of Record. An "address of record", whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.

Call Detail Information. Any information that pertains to the transmission of specific 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 with the call was placed, the time, location, or duration of any call.

Customer. A customer of a telecommunications carrier is a person or entity to which the telecommunications carrier is currently providing service.

Opt-in approval. The term "opt-in approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that the carrier obtain from the customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the carrier's request consistent with the requirements set forth in this subpart.

Opt-out approval. The term "opt-out approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the

waiting period described in 64.2008(d)(1) after the customer is provided appropriate notification of the carrier's request for consent consistent with the rules in this subpart.

Pretexting. "Pretexting" is the practice of pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications records.

Telephone number of record. The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information".

Valid photo ID. A "valid photo ID" is a government-issued means of personal identification with a photograph such as driver's license, passport, or comparable ID that is not expired.

General

Unless required by law or with the approval of the customer, the Company will only use, disclose, or permit access to individually identified CPNI in its provision of:

(1) The telecommunications service from which the information is derived.
(2) Services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories.

The Company uses CPNI to:

(1) Initiate, render, bill, and collect for telecommunications services.
(2) Provide inbound marketing, referral, or administrative services to the customer for the duration of the call, if the call was initiated by the customer and the customer approves of the Company's use to provide such service.
(3) Provide call location information concerning the user of a commercial mobile service in certain specified emergency situations, if applicable.

Exceptions

The Company may use, disclose, or permit access to CPNI, without customer approval, only as described below.

The Company may use, disclose, or permit access to CPNI for the purpose of providing or marketing service offerings among the categories of service (i.e., local, interexchange, and CMRS) to which our customer already subscribes without customer approval.

If a customer subscribes to more than one category of service offered by our Company, then the Company may share CPNI among our affiliated entities that provide a service offering to the customer.

If a customer does not subscribe to more than one offering of our Company, then the Company will not share that customer's CPNI with its affiliates, except in accordance with the Opt-out procedures described below.

The Company may use CPNI, without customer approval, to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

The Company may use, disclose, or permit access to CPNI, without customer approval, in its provision of inside wiring installation, maintenance, and repair services.

The Company may also use, disclose, or permit access to CPNI to protect its rights or property, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.

Notification

Prior to any solicitation for customer approval, the Company will provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI. The customer notification shall provide sufficient information to enable the customer to make an informed decision as to whether to permit the Company to use, disclose, or permit access to, the customer's CPNI.

The Company will maintain records of notification, whether oral, written, or electronic, for at least one year.

All notices will:

(1) State that the customer has a right, and the Company has a duty, under Federal law, to protect the confidentiality of CPNI.
(2) Specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of his or her right to disapprove those uses, and deny or withdraw access to CPNI at any time.
(3) Advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and must clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. However, the Company may provide a brief statement, in clear and neutral language, describing consequences directly resulting from the lack of access to CPNI.
(4) Be comprehensible and must not be misleading.

When written notification is provided, the notice must be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.

The Company may state in the notification that the customer's approval to use CPNI may enhance the carrier's ability to offer products and services tailored to the customer's needs. The Carrier also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.

The Carrier may not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.

The notification must state that any approval, or denial of approval, for the use of CPNI outside of the service to which the customer already subscribes from the Company is valid until the customer affirmatively revokes or limits such approval or denial.

The Company's solicitation for approval must be proximate to the notification of a customer's CPNI rights.

Customer Approval for use of CPNI

Northland Communications does not give CPNI to any third parties except as discussed below. No third party is ever given access to our customers' proprietary network information for the purpose of marketing. Northland Communications does not initiate calls to customers for the purpose of sales or marketing.

Northland Communications currently uses the opt-out method for obtaining approval to use CPNI. Customers are notified bi-annually of their right to approve or deny use of their CPNI via a postcard that is mailed to the billing address of record. The contents of each notification comply with the standards described above. The notifications define the applicable waiting period for a response before approval is assumed. After mailing, the Company waits 30-days (or in its discretion a longer period of time) after giving customers such notice and an opportunity to Opt-out before assuming customer approval to use, disclose, or permit access to CPNI. The waiting period begins to run on the third day following the date that the notification was mailed.

The Company may use Opt-out approval to obtain a customer's consent to share CPNI among the Company's affiliates.

Accounts for customers who choose to deny access to their CPNI are marked as "CPNI Restricted". If a customer has denied use of CPNI and initiates a call to the Company, one-time customer authorization for use of CPNI is obtained verbally from the customer at that time. The Company notifies the customer that their waiver of the CPNI requirements is for the duration of the call only.

The contents of any such notification must comply with the requirements the Notification Section above, except that the Company may omit any of the following notice provisions if not relevant to the limited use for which the Company seeks CPNI:

1. The Company need not advise customers that if they have opted-out previously, no action is needed to maintain the Opt-out election;
2. If the Company's limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party, then the Company need not advise customers that the Company may share their CPNI with the Company's affiliates or third parties and need not name those entities,
3. The Company need not disclose the means by which a customer can deny or withdraw future access to CPNI, but the Company must then explain to

customers that the scope of the approval the Company seeks is limited to one-time use; and

4. If the Company communicates clearly that the customer can deny access to his CPNI for the call, then the Company may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI.

While a customer may orally approve CPNI usage, the Company has the burden of demonstrating such approval has been given. When this one-time authorization is obtained from a customer, a memo is put on their account. Memos remain on a customer's account permanently.

Approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by the Company must remain in effect until the customer revokes or limits such approval or disapproval.

Records of approvals to use CPNI, whether oral, written, or electronic, are maintained for at least one year.

Call Detail Inquiries

The Company will disclose call detail information* to a customer only in one of the following situations:

1. The customer is able to provide the call detail information without assistance. The customer must provide the number called, the date of the call, the time of the call, and the duration of the call. If they provide all of these items, we may discuss the call detail information provided by the customer.
2. The customer is on-site, and provides a valid photo ID, matching the name on the account.
3. We can call the customer back at the telephone number of record.
4. We can mail the information to the address of record. We can also e-mail the information to the e-mail address of record, if one exists at the time of the inquiry. Any address of record must be established for 30 days prior to the inquiry.

*Call detail information for local calls is only provided with a subpoena.

E-mailed Bills

Customers of Northland Communications have the option of having their bills e-mailed to them. Customers must call the Business Office to set up this feature. The customer service representative must verify that he/she is speaking with a person listed on the account, without the use of readily available biographical information or account information, using one of the following methods:

1. The customer is on-site, and provides a valid photo ID, matching the name on the account.
2. We can call the customer back at the telephone number of record.

After authentication, the customer request is processed, and a notification is sent to the customer pursuant to the "Notice to Customers of Account Changes" section below.

Address Changes, postal or e-mail
When customers call the Business Office or come in and request an address change (either postal address or e-mail address), the customer service representative must verify that he/she is speaking with a person listed on the account, without the use of readily available biographical information or account information, using one of the following methods:

1. The customer is on-site, and provides a valid photo ID, matching the name on the account.
2. We can call the customer back at the telephone number of record.

After authentication, the customer request is processed, and a notification is sent to the customer pursuant to the "Notice to Customers of Account Changes" section below.

Other Customer Service/Billing Inquiries
Other than the instances listed above, when a call is received or a person comes into the office, we verify that we are speaking with the primary or secondary authorized contact listed on the account before answering any questions regarding the account. The primary authorized and secondary authorized contacts on the account are the only authorized people to make additions, changes or deletions to the account.

Information on the account regarding contract terms, rates, etc. are not to be discussed with anyone else besides the primary and secondary authorized contacts.

No information is to be released to another service provider without a Letter of Agency or written authorization from the customer.

If a primary authorized or secondary authorized contact changes, we need to secure the change in writing (email/fax) from a remaining active contact to authorize Northland Communications to update our records. Northland Customer Relations Representatives have the authority to authorize the change without the written authorization.

If the account is marked as "CPNI restricted", employees may not use the customer's information to offer the customer any other services without first obtaining the customer's verbal permission to make such an offer. When this one-time authorization is obtained from a customer, a memo is put on their account. Memos remain on a customer's account permanently.

General information regarding our services may be given to anyone that inquires.

Business customer exemption
The Company may bind itself contractually to authentication regimes other than those described above for services it provides to its business customers that have both a dedicated account representative and a contract that specifically addresses the Company's protection of CPNI.

Notice to Customers of Account Changes
Northland Communications notifies customers via postal letter when any of the following changes are made to their account:

1. The customer's billing address of record was changed

Notifications are mailed to the billing address of record, provided that address has been the billing address of record for at least 30 days. In cases where the billing address was changed, notification is mailed to the previous billing address. In cases where the current address of record has not been effective for 30 days, the notification is mailed to the previous address of record.

Notifications only indicate that a change was made to the account, and do not give any detail of the change. This notification is not required when the customer initiates service.

Trouble Tickets
Anyone is authorized to call in a service affecting repair. Most companies will have one person designated for this; however, we will take a trouble call from anyone within the company. If the person is not listed on the account as either a primary or secondary authorized contact, no account information can be given to them.

If the trouble is a billable service issue, authorization must come from either the primary or secondary authorized contacts.

Marketing
The Company will maintain records of all marketing campaigns which use CPNI. Such records will include a description of the campaign, the specific CPNI used in the campaign, and what products and services were offered as a part of the campaign. The Company shall retain the records for a minimum of one year.

No third party is ever given access to our customers' proprietary network information for the purpose of marketing.

Northland Communications does not use local service CPNI to track customers' calls, either to competitors or any other number.

The Company has established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and maintain records of compliance for a minimum period of one year. Sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Collections
Northland Communications initiates contact with customers for collection of unpaid past due charges. Employees are only permitted to speak with the primary, secondary or accounts payable department regarding the unpaid balance or any possible discontinuance of service. When leaving a message for the any of the above, employees are only permitted to ask that the customer return the call to Northland Communications.

When the Company is unable to collect a past due balance, the customer's account is turned over to a third party collection agency. Employees are permitted to give this third party the customer's name, address, telephone number, social security number (if known), and amount owed. Copies of customer bills are not given to the collection agency.

Joint Venture/Contractors
The Company must obtain explicit approval from a customer before disclosing CPNI to joint venture partners or independent contractors. Northland Communications does not disclose customer CPNI to contractors or joint venture partners.

Other Carriers
Customers of Northland Communications may also subscribe to long distance services provided by other carriers not affiliated with Northland Communications. PIC changes are received by Northland Communications directly from the customer.

Porting requests are received by Northland Communications by fax or e-mail. We verify the accuracy of the customer information listed by the other carrier and process the order in our system. Northland Communications does not share any CPNI with these carriers. The information sent to us is given to the carrier by the customer.

Northland Communications does not contact the customer after receiving a change request from another carrier, except for verification, billing and collection purposes.

Law Enforcement
Customer information may be provided to law enforcement agencies that provide a subpoena for the information.

Training
Employees of Northland Communications are trained to protect CPNI verbally and with written procedures. All written procedures involve only answering questions incoming from customers, not making sales or marketing calls to customers. There are no duties requiring or authorizing employees to call customers for marketing purposes; job descriptions for customer service representatives only include answering questions from customers. Employees are trained to authenticate customers as described above.

Northland Communications employees are aware of the Company's policies.

Disciplinary Process
Employees who violate the Company's CPNI guidelines are first given a verbal warning. A second offense results in a written warning from Human Resources. A third offense results in suspension or termination.

Notice of Unauthorized Disclosure of CPNI
In the event of a CPNI breach, the Company will notify the local FBI office:

Utica Resident Agency
1634 Genesee Street
Utica, NY 13502
(315) 732-2157

The Company shall not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement.

As soon as practicable, an in no event later than seven (7) business days, after reasonable determination of the breach, the Company will electronically notify the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") through a central reporting facility. The internet link to the reporting facility that shall be used by the Company shall be that maintained by the FCC at *http://www.fcc.gov/eb/cpni*.

Notwithstanding any state law to the contrary, the Company shall not notify customers or disclose the breach to the public until seven (7) full business days have passed after notification to the USSS and the FBI except if the Company believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than the seven (7) business days provided for, in order to avoid immediate and irreparable harm, the Company shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. The Company shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.

If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct the Company not to so disclose or notify for an initial period of up to 30 days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency. If such direction is given, the agency shall notify the Company when it appears that public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to the Company, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writings shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by the Company.

After the Company has completed the process of notifying law enforcement, the Company shall notify its customers of a breach of those customers' CPNI.

The Company shall maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI, and notifications made to customers. The record shall include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company shall retain the record for a minimum of 2 years.

As used in this section, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

Compliance Certificate

An officer, as an agent of the Company, shall sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with federal CPNI regulations. The Company shall include with the certification a statement explaining how the Company's operating procedures ensure that it is or is not in compliance with the rules in this subpart. Additionally, the Company shall include with its certification an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. The Company shall make this filing annually with the Enforcement Bureau of the FCC on or before March 1 in EB Docket No. 06–36, for data pertaining to the previous calendar year.

Notice of Non-Compliance

The Company shall provide to the FCC written notice within five business days of any instance where the Opt-out mechanisms do not work properly, to such a degree that consumers' inability to Opt-out is more than an anomaly. The notice shall be in the form of a letter, and will include the Company's name, a description of the Opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when the Company will/did implement it, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. The Company shall provide such notice even if the Company offers other methods by which consumers may Opt-out, and only one of those methods was affected.