JOHNSON TELEPHONE COMPANY
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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 2013 covering the prior calendar year 2012

Date Filed: Monday, February 25, 2013

Name of company(s) covered by this certification: Johnson Telephone Company

Form 499 Filer ID: 807108

Name of signatory: Dwayne Johnson

Title of Signatory: Vice President

I, Dwayne Johnson, 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 (See Attached Compliance Statement).

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.

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 misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Dwayne Johnson

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STATEMENT OF COMPLIANCE – For Year 2012

The operating procedures of **JOHNSON TELEPHONE COMPANY** ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization) access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.