Molalla Communications
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Annual 47 C.F.R. §64-2009 (e)
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013

Date Filed: **January 15, 2014**

Name of company covered by this certification: **Molalla Communications Company**

Form 499 Filer ID: **804822**

Name of signatory: **Steve Loutzenhiser**

Title of signatory: **President/CEO**

Certification

I, Steve Loutzenhiser, 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 Federal Communications 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, 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., 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. NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, 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.

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 _____ Date: Jan 6, 2014

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (if applicable)
Summary of customer complaints (if applicable)

STATEMENT

Molalla Communications Company ("MCC") has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- MCC has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

- MCC continually educates and trains its employees regarding the appropriate use of CPNI. MCC has established disciplinary procedures should an employee violate the CPNI procedures established by MCC.

- MCC maintains a record of its and its affiliates' sales and marketing campaigns that use its customers CPNI. MCC also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.

- MCC has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of its compliance for a minimum period of one year. Specifically, MCC sales personnel obtain supervisory approval of any proposed outbound marking request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

- MCC took the following actions against data brokers in 2013, including proceeding instituted or petitions filed by MCC at a state commission, in the court system, or at the Federal Communications Commission: there were no data broker incidents in 2013.

- The following is information MCC has with respect to the processes pretexters are using to attempt to access CPNI, and what steps carriers are taking to protect CPNI: **None**

- The following is a summary of all customer complaints received in 2013 regarding the unauthorized release of CPNI:

  - Number of customer complaints MCC received in 2013 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: **0**

  - Category of complaint:

    - **0** Number of instances of improper access by employees.

    - **0** Number of instances of improper disclosure to individuals not authorized to receive the information.

    - **0** Number of instances of improper access to online information by individuals not authorized to view the information.

    - **0** Number of other instances of improper access or disclosure.

  - Description of instances of improper access or disclosure: n/a