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

Annual 64.2009(e) CPNI Certification for 2014

Date filed: 1/22/2014

Name of company covered by this certification: Pioneer Telephone Cooperative

Form 499 Filer ID: 811677 – Pioneer Telephone Cooperative

Name of signatory: Jerry Schlachter

Title of signatory: Executive Vice President – Jerry holds this title in each entity.

I, Jerry Schlachter 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 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.

Signed

Jerry Schlachter

Pioneer Telephone Cooperative
Annual CPNI Certification
Compliance Summary Statement
01/7/14

1. Establishment of CPNI Champions

Key individuals were selected to develop our internal processes in adapting the new CPNI rules. Their task was to become CPNI knowledgeable, establish training programs, record and create necessary documentation and to insure that our members were properly notified of the changes. Additionally, we worked with our billing software vendor to implement software changes to restrict access to CNPI detail without proper authorization and to create member notification for CPNI affected account changes.

2. Employee Notification and Training

After the April 2007 notification that the CNPI rules were going to be enhanced, and prior to 12-08-07, all company employees received CPNI training. Those employees who have specific access to CPNI data were given further training including role playing to insure that they understood the new CPNI rules. Since that time, all employees receive annual training on CNPI rules as well as their responsibilities pertaining to the Red Flag Compliance Program. Additionally, our managers and supervisors continue to attend industry seminars and webcasts to keep current with any industry discussions or rule changes.

3. Member Notification of Rule Changes

We notified our members starting in late October 2007 of the new CPNI rules through notices on our bills, our newsletter, and a notice on our website. As we wanted to provide passwords, we additionally mailed letters to each member prior to 12-08-07 notifying them of new authentication procedures, their temporary password, the purpose for the new CPNI enhancements and their Opt-Out rights. As a part of the member's account information, our billing software provides a database for member Opt-Out elections, passwords and back-up means of authentication through member answered questions. We continue to maintain an opt-out database and adhere to our members wishing regarding receiving marketing material. Additionally, new members establish passwords and are informed of their opt-out rights upon establishing service. All members are reminded of their opt-out rights periodically and in adherence to the guidelines.

4. Carrier Authentication – Protecting Access to Customer Records

Prior to releasing any call detail**,** every member must be authenticated to verify their identity and to verify that they are listed as an authorized person on the account. Members who come into the business office must present a valid photo ID. Members who call in are required to provide a previously

established password. If the member is unable to be authenticated, then call detail may only be released by mailing it to the address of record or calling the member at the telephone number of record.

5. Notification of Account Changes

Our billing software automatically generates member notification letters when certain account changes occur, including, changes to a password, customer responses if back-up authentication is used, lost or forgotten passwords, or address of record is created or changed.

6. Notice of Unauthorized Disclosure of CPNI

We have established a notification process for both law enforcement and members in the event of a CPNI breach. We have not had any breaches or unauthorized disclosure of CPNI in the last 12 months.

7. Joint Venture and Independent Contractor Use of CPNI

We do not use or release member CPNI for the purposes of joint venture and/or independent contractor marketing.

8. Employee Disciplinary Process for Unauthorized Disclosure

The Cooperative endorses a policy of progressive discipline in which it attempts to provide employees with notice of deficiencies, in this case, unauthorized disclosure of CPNI, and an opportunity to improve. The disciplinary process may include a combination of policy review, monitoring, verbal warning, written warning, suspension and termination.