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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 19, 2014

Name of company covered by this certification: CAP Cable

Form 499 Filer ID: 828651

Name of signatory: Stuart Gilbertson

Title of signatory: Chief Operating Officer

I, Stuart Gilbertson, 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 action (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: _____

CPNI – Customer Proprietary Network Information

Certification Statement

USA Companies enforces the following procedures regarding protection for our phone customers:

1) Obtain the name of individual on the account
2.) If the person on the phone is not the account holder, get the name of the individual calling
3.) Obtain the phone number
4.) Verify the address and the 'Bill To Address' (BTA)
5) Obtain the last 4 digits of the social security number of the account holder
    a. If the individual is not the account holder, that individual is not allowed to make changes to a pending work order or to the account
6.) Obtain the password setup previously by the customer before answering any further questions regarding CPNI.

USA Companies also enforces the additional standards for our customers:

1.) We do not sell or provide any unrelated third party information regarding our customers. All customers are automatically 'opted-out' for consent to disclose CPNI to these unrelated third parties or to any joint venture partner or independent contractors.
2.) On-line access to CPNI is protected by a password pin number established by the customers and maintained by our carrier, Momentum
3.) The password is also setup in our billing system for each phone customer and is required before providing any information or making any change to the individual's phone service.
4) Notification to our customers and law enforcement is provided in instances of breaches of confidentiality
5.) All Customer Service Representatives and Technical Support staff are trained on the above requirements.
6) The billing manager audits our phone customers on a routine basis to determine that all phone customers have a password pin number on file.
7.) The CSR and Technical Support managers routinely listen to staff calls with customers to ensure the above procedures are maintained.
8) All information kept on our servers are protected by our network firewalls and maintained by our Information Technology Officer We also provided internal network security mechanisms.