BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

EB-06-TC-060

EB Docket No. 06-36

ANNUAL 47 C.F.R § 64.2009(e) CPNI CERTIFICATION

Annual 64.2009(e) CPNI Certification for 2013

Date filed: 3/06/14

Name of company covered by this certification: Conneaut Telephone Company

Form 499 Filer ID: 808860

Name of signatory: Kenneth E. Johnson

Title of signatory: General Manager and CEO

I, Kenneth E. 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.

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 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.

Signed

Kenneth E. Johnson, General Manager and CEO
Conneaut Telephone Company

CONNEAUT TELEPHONE COMPANY
STATEMENT OF CPNI PROCEDURES

Conneaut Telephone Company has created a CPNI Policy Handbook containing the following procedures that it has adopted to ensure the protection of CPNI. The handbook describes our procedures in greater detail and provides practical guidance on how to protect against unauthorized disclosure or use of CPNI. The handbook is distributed to our employees during training and serves as an important reference tool for our employees.

Duty to Protect CPNI

We as a communications company recognize our duty to protect customer CPNI. We may not disclose CPNI to unauthorized persons, nor may we use CPNI in certain ways without consent from our customers. Before we can provide customers with their own CPNI, we must authenticate the customer.

We recognize that there are a few cases in which we can disclose CPNI without first obtaining customer approval:

1. Administrative use: We may use CPNI to *initiate, render, bill and collect* for communications services.

2. Protection of carrier and third parties: We may use CPNI to protect the interests of our company, such as to prevent fraud or illegal use of our systems and network. Employees are notified of the steps to take, if any, in these sorts of situations.

3. As required by law: We may disclose CPNI if we are required to by law, such as through legal process (subpoenas) or in response to requests by law enforcement. Employees are notified of any steps they must take in these situations.

Our Own Use Of CPNI

We may use CPNI to provide or market services to our existing customers. We understand that we are required to obtain customer approval prior to using CPNI in certain ways, but we do not use CPNI in this fashion.

Marketing

We understand that we do not need to obtain customer approval before using CPNI to market services to our existing customers within the categories of service to which the customer already subscribes.

We understand that we may not use CPNI to market services that are in a service category to which the customer does not already subscribe without customer approval.

We understand that we cannot use CPNI to solicit a customer to add a new category of service without first obtaining the customer's approval.

We also understand that we do not need customer consent before using CPNI to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain centrex features.

We understand that we may not use CPNI to identify or track customers that call competing service providers.

We regularly review our marketing practices to determine when and how CPNI is used within the company, and whether CPNI is being shared with other entities. We also review new marketing or sales campaigns to ensure compliance with these CPNI policies and with the FCC's CPNI regulations. We do not share CPNI with any affiliates or other third parties.

Provision of Services

We understand that we do not need customer approval to use CPNI to provide CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

Authenticating Customers Before Disclosing CPNI

We understand that we are required to objectively determine that our customers are who they say they are before disclosing CPNI to them.

Telephone

We understand that when a customer calls, we may not release *call detail information*, or information relating to the transmission of specific telephone calls until we have obtained the account password from the caller, or called the customer back at the telephone number of record to ensure that the customer is who s/he says s/he is. Alternatively, we may offer to send the call detail information to the address of record or provide it to the customer or authorized individual in person after s/he has produced valid photo identification at our office.

We understand that we may disclose *non-call detail information* over the telephone after authenticating the customer by calling back the telephone number of record, checking valid photo identification, or by mailing the information to the account address of record.

In-Person Authentication

We understand that before we can disclose CPNI to customers in person, the customer must present *valid government-issued photo identification*. The name on the photo identification must match the name on the account. If the customer cannot present the required identification, we offer to provide the requested CPNI by sending it to the account address of record.

Before providing the CPNI to the customer, we make a copy of the photo identification. This copy is then placed in the customer's file, together with a copy of the CPNI provided to the customer. These records are then kept in the customer file in accordance with our record-keeping policies.

Mail

If the customer requests CPNI through regular mail, or if the customer cannot comply with one of the authentication methods above, we send the requested information to the customer's address of record only.

Online Access

We password protect online access to CPNI. New customers establish passwords at service initiation. We have issued randomly-generated PINs to our existing customers, which can then be used to log in the first time. These customers are then asked to create a personal password. We do not allow customers to choose passwords based on their readily available biographical information or account data. Customer passwords must be more than 6 characters and contain at least one number and one letter.

After a customer has made 3 failed attempts to log into his/her online account, we block online access to the account for security purposes. Customers locked out of their online accounts must contact our office to regain online account access.

If a customer loses or forgets his/her online account password, the customer may answer a series of security questions in order to gain access to the account. The customer is then given the opportunity to choose a new password. Again, if the customer fails to provide the correct answer to the security questions, we block online access to the account for security purposes. These customers will need to contact our office to regain online access.

Customer Notification of CPNI Rights

We do not use CPNI in such a way as to require customer notice under the FCC's rules.

Training And Discipline

We trained all of our employees regarding the company's CPNI policies prior to the effective date of the most recent CPNI regulations, December 8, 2007. Employees are required to attend an annual retraining to ensure that they understand the company's CPNI policies and any updates to those policies. New employees who will have access to CPNI are trained when they join the company, and then attend the regularly-scheduled retraining sessions. At the conclusion of each training session, employees are asked to sign certificates stating that they understand the company's CPNI policies and that they will comply with those policies.

We have implemented the following disciplinary guidelines for employees who fail to follow our CPNI policies:

> Conneaut Telephone Company has informed its employees that it considers compliance with the Communications Act and FCC rules regarding the use, disclosure, and access to CPNI to be very important. Violation by company employees of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, and probation), depending upon the circumstances of the violation (including the severity of the violation, whether appropriate guidance was sought, and the extent to which the violation was or was not deliberate or malicious).

Disciplinary records are maintained in the company files in accordance with our record-keeping policies.

Record-Keeping

We maintain the following records in our files for 5-10 years:

a. Records relating to the annual mailing of the customer CPNI privacy policy;

b. Records of customer approval or disapproval of CPNI use, or the limitation or revocation thereof;

c. Employee disciplinary records; and

d. Records of discovered CPNI breaches, notifications to law enforcement regarding breaches, and any responses from law enforcement regarding those breaches.

Notification Of Account Changes

We understand that we are required to notify customers when changes have been made to passwords, customer responses to back-up means of authentication, online accounts, or addresses of record by mailing a notification to the account address of record.

We do not reveal the changed account data in the notification.

Unauthorized Disclosure Of CPNI

We understand that we must report CPNI breaches to law enforcement no later than seven (7) business days after determining the breach has occurred, by sending electronic notification through the link at http://www.fcc.gov/eb/CPNI/ to the central reporting facility, which will then notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI).

We understand that we may not notify customers or the public of the breach earlier than seven (7) days after we have notified law enforcement through the central reporting facility. If we wish to notify customers or the public immediately, where we feel that there is "an extraordinarily urgent need to notify" to avoid "immediate and irreparable harm," we inform law enforcement of our desire to notify and comply with law enforcement's directions.

Records relating to such notifications are kept in accordance with our record-keeping policies. These records include: (i) the date we discovered the breach, (ii) the date we notified law enforcement, (iii) a detailed description of the CPNI breached, and (iv) the circumstances of the breach.

During the course of the year, we compile information regarding pretexter attempts to gain improper access to CPNI, including any breaches or attempted breaches. We include this information in our annual CPNI compliance certification filed with the FCC.

Signed

Kenneth E. Johnson, General Manager and CEO
Conneaut Telephone Company