

TRUVISTA COMMUNICATIONS
112 York Street; Chester, SC 29706; (803) 385-2191

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

Annual 64.2009(e) CPNI Certification for 2019

Date signed: **February 28, 2020**

Names of Companies Covered by this Certification

The Chester Telephone Company	499 Filer ID 801357
Chester Long Distance Services, Inc.	499 Filer ID 801423
Ridgeway Telephone Company, Inc.	499 Filer ID 801402
The Lockhart Telephone Company, Inc.	499 Filer ID 801426
Fairfield Communications, Inc.	499 Filer ID 823736
Camden Corporate Investments, LLC	499 Filer ID 827039
TruVista Communications of Georgia, LLC	499 Filer ID 829308

Name of signatory: **Eric Ramey**

Title of signatory: **Sr. Director – Administration & Regulatory Affairs**

I, **Eric Ramey**, 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 (including those mandating the adoption of CPNI procedures, training, safeguards, 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.

The company has not received 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:  _____

TRUVISTA COMMUNICATIONS

2019 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE February 28, 2020

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This statement accompanies the Company's 2019 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule sections refer to rules under Part 64, Subpart U.

1. Uses of CPNI for Marketing

The Company limits use of CPNI for marketing to the following:

- a. Pursuant to Sections 64.2007(a) and 64.2008(f), the Company uses CPNI, subject to customer authorization, for one-time use during in-bound calls from customers.
- b. Pursuant to Section 64.2005(a), the Company uses CPNI from a category of telecommunications service (local, interexchange or wireless) for marketing limited to use for marketing services in the same category of service from which the CPNI is derived or to another category of telecommunications service to which the customer also subscribes.

2. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

3. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

4. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

TRUVISTA COMMUNICATIONS CPNI STATEMENT

5. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

6. Customer One-Time Notification and Authorization Process

The Company has developed procedures for one-time oral notification of customers making inbound calls regarding CPNI pursuant to the requirements of Section 64.2007 generally and Section 64.2007 generally and Section 64.2007(f) specifically.

7. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

8. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information controlled by password.

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

9. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.

10. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

11. Supervisory Review Process for Outbound Marketing

The Company has a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules as well as related record keeping pursuant to Section 64.2009(c).

12. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related record-keeping and deferred notification to customers.