



**Via ECFS**

February 08, 2019

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36  
Annual 64.2009(e) CPNI Certification for 2017  
Date filed: January 26, 2018  
Name of company covered by this certification: Pacific Data Systems  
Form 499 Filer ID: 823328  
Name of signatory: John Day  
Title of signatory: President

Dear Ms. Dortch:

I, John Day, 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 and any affiliates have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules located at 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 actions against data brokers in the past year.

The company has not received customer complaints in the past year concerning unauthorized release of CPNI.

If any further information is required, please contact me at 671-300-0202 or by email at [john@pdsguam.com](mailto:john@pdsguam.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Day', is written over a printed name and title.

**John Day**  
President

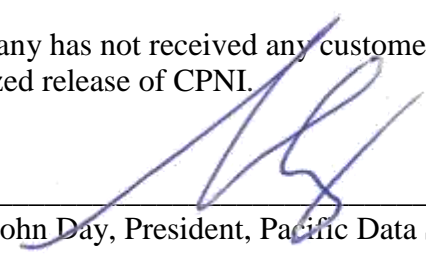
185 Ilipog Drive •HBC Suite 204A•Tamuning, GU 96913  
Phone: 671-300-0200•Fax: 671-300-0265•[www.pdsguam.com](http://www.pdsguam.com)

## CPNI Compliance Statement of Pacific Data Systems

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007)(“EPIC CPNI Order”),<sup>1</sup> John Day, President of Pacific Data Systems and affiliated entities makes the following statement:

Pacific Data Systems understands that it must report on any information that it has with respect to the processes pretexters are using to attempt to access CPNI, and what steps Pacific Data Systems is taking to protect CPNI. Pacific Data Systems 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) 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: x  \_\_\_\_\_  
John Day, President, Pacific Data Systems

Date: February 08, 2019

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<sup>1</sup> 47 C.F.R. S: 64.2009(e) states: “A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an 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. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.”