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Annual 64.2009(e) CPNI Certification for 2018

Date filed: 2/13/2019

Name of company covered by this certification: Vector Data Systems LLC

Form 499 Filer ID: 827101

Name of signatory: Patrick Shoemaker

Title of signatory: Partner

I, Patrick Shoemaker, certify that I am an officer of Vector Data Systems LLC, 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. S: 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) 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

A handwritten signature in blue ink, appearing to read "Patrick Shoemaker", is written over a horizontal line.

Vector Data Systems LLC  
Accompanying Statement to Annual CPNI Certification  
2/13/2019

Vector Data Systems LLC has not used CPNI except as included in 47 U.S.C. 222(d) exceptions.

- The Company has not sought customer approval of the use of CPNI since CPNI is never divulged or used for sales and marketing purposes.
- All employees have received training regarding the proper usage of CPNI.
- All employees are prohibited from using CPNI in unauthorized manners.
- Sales and marketing campaigns do not use CPNI.
- Access to all forms of CPNI that are stored by Company is restricted to authorized personnel only. Access restrictions include the use of password-protected secure databases as well as conventional information security methods.
- Protocol has been established in order to notify the appropriate Law Enforcement Agencies in the event of an unauthorized disclosure of CPNI.
- Protocol has been established in order to authenticate customers before CPNI is made accessible by means of a password authentication system.