

Global Telco Group, Inc.

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

Set forth below is a statement summarizing the policies and procedures of Global Telco Group, Inc. ("Global Telco Group") which ensure adequate compliance with the Federal Communications Commission's ("FCC") CPNI regulations. See 47 C.F.R. § 64.2001 et seq. Global Telco Group provides telecommunications services exclusively on a prepaid basis.

As a prepaid services provider, the company does not have access to CPNI. Prepaid services customers do not "subscribe" to the services of Global Telco Group in the same manner as customers of non-prepaid service providers; rather, these customers decide for themselves if they will use the company's services. These customers do not receive bills from Global Telco Group. Global Telco Group does not have information concerning the quantity, technical configuration, type, destination, location, or amount of use of telecommunications services which can be associated with any individual customer. Indeed, because the company's prepaid services may lawfully be utilized by any authorized user of the purchased services, Global Telco Group has no means of identifying the particular individual which has placed any particular call.

Nevertheless, Global Telco Group has adopted a confidentiality policy that addresses proper handling, use and storage of CPNI and, furthermore, the company has informed its employees of the company's CPNI compliance policy. Global Telco Group does not release or distribute CPNI to unauthorized individuals; neither does Global Telco Group use CPNI in violation of § 64.2001 et seq. of the FCC's Rules.

To the extent Call Detail Records ("CDRs") exist, they are not associated with any individually identifiable customer and do not constitute CPNI. To the extent that such CDR information exists in paper, removable magnetic or optical form, it is maintained by Global Telco Group in a secure location which is not accessible by employees of Global Telco Group without going through the company's established security procedures. When such information is maintained on a computer, the computer and/or the individual file is password protected.

As noted above, Global Telco Group does not maintain CPNI in any manner which would give rise to the unauthorized disclosure of confidential information. Even in cases dealing with the limited information which is necessary to facilitate customer purchases of prepaid telecommunications services, Global Telco Group takes steps prior to providing any requested information to assure itself that the individual making the request is authorized to obtain it.

Moreover, any call detail information obtained by Global Telco Group is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes. In the event of unauthorized CPNI access, Global Telco Group will notify the requisite law enforcement agencies, and the customer when possible.

Global Telco Group did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Because Global Telco Group does not have any presubscribed customers, and does not know the identity of end-users whose traffic is routed through Global Telco Group, it cannot notify those end-user customers directly if a breach occurs. However, Global Telco Group has processes and

procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches. Finally, the company has no information, other than publicly reported information regarding the processes that pretexters or data brokers are using to attempt to access CPNI.

Global Telco Group, Inc.

**Annual CPNI Certification
47 C.F.R. § 64.2009(e)
EB Docket No. 06-36**

COMPANY NAME: Global Telco Group, Inc.

REPORTING PERIOD: January 1, 2017 - December 31, 2017

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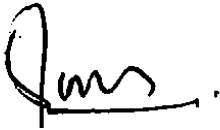
OFFICER: Kamal Sandhu

TITLE: CEO

I, Kamal Sandhu, hereby certify that I am an officer of Global Telco Group, Inc. ("Global Telco Group") and that I am authorized to make this certification on behalf of Global Telco Group. I have personal knowledge that Global Telco Group has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Global Telco Group or to any of the information obtained by Global Telco Group. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures Global Telco Group employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Global Telco Group or to the information obtained by Global Telco Group.

Signed:



On behalf of Global Telco Group, Inc.

Date: February 6, 2018