

**Annual 47 CFR § 64.2009(e) CPNI Certification Template**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

1. Date filed: 20<sup>th</sup> February 2019
2. Name of company(s) covered by this certification: Bharti Airtel (USA) Limited
3. Form 499 Filer ID: 826875
4. Name of signatory: Eric Gillenwater
5. Title of signatory: Chief Executive Officer
6. Certification:

I, Eric Gillenwater 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 CFR § 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 CFR § 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.

Bharti Airtel (USA) Limited



Eric Gillenwater  
Chief Executive Officer  
Bharti Airtel (USA) Limited  
80, River Street, Suite 2B  
Hoboken, NJ 07030

**Attachments:** Accompanying Statement explaining CPNI procedures

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**Attachment 1: Statement Concerning Company Procedures**

By the attached certificate, I hereby certify to the commission as an officer of Bharti Airtel (USA) Limited that Bharti Airtel (USA) Limited has established and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the commission's rules governing Customer Proprietary Information ("CPNI").

**Bharti Airtel (USA) Limited – 80 River St, Suite 2B, Hoboken, NJ 07030**  
**Company Registration Number - 20-5560640**

Bharti Airtel (USA) Limited CPNI policies expressly prohibit release of CPNI to any employee not directly involved in the provision of services to the customers, subject to disciplinary action and termination of employment. Employees that may have access to CPNI services receives an initial CPNI certification briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for the purposes of serving current subscribers. The company does not sell, or otherwise release, CPNI to other entities under any circumstances. Bharti Airtel (USA) Limited's parent corporation follows the same procedure. All contact with customer is documented through retention of electronics copies of communications and retention of any scripts used if contacting subscribers telephonically for a minimum period of one year. All sales or marketing campaigns initiated by the company require my approval as the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2018, the Company took no action against data brokers. In calendar year 2018, the Company received no consumer complaints regarding CPNI issues.

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.

For Bharti Airtel (USA) Limited



Eric Gillenwater  
Chief Executive Officer  
80, River Street, Suite 2B  
Hoboken, NJ 07030