

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for year 2018

Date filed: Feb. 22, 2019

Company Name: China Unicom (Americas) Operations Ltd.

Form 499 Filer ID: 824402

Name of Signatory: Wesley Haiqiang Liu

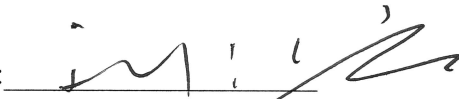
Title of Signatory: Corporate Secretary

I, Wesley Haiqiang Liu, certify that I am Corporate Secretary of the Company named above, and acting as an agent of the Company, that I have personal knowledge that China Unicom (Americas) Operations Ltd. (“China Unicom” or the “Company”) has established internal operating procedures pursuant to Section 222 of the Communications Act of 1934, as amended (47 U.S.C. § 222) and Section 64.2001 *et seq.* of the rules of the Federal Communications Commission to safeguard the use and dissemination of customer proprietary network information (“CPNI”).

China Unicom does not use CPNI for marketing purposes. It also does not provide CPNI to any affiliated or non-affiliated third parties, except as necessary to provide the services and as permitted in Section 222(d) of the Communications Act. China Unicom has implemented policies and procedures to safeguard CPNI, including:

- Developing CPNI compliance procedures and policies;
- A training mechanism to ensure that employees to comply with the CPNI rules (a policies and procedures document on the use and safeguarding of CPNI) and instructing employees not to conduct any marketing without internal oversight and approval to ensure the CPNI requirements are followed (and to establish appropriate consumer consent mechanisms as required);
- Taking disciplinary action against employees for any violations of the Company’s CPNI policies;
- Establishing a process to maintain any applicable CPNI-related records (including any sales and marketing campaigns that the Company may undertake in the future and customers’ decisions with respect to the use of CPNI);
- Designating a corporate officer who is responsible for overseeing the Company’s compliance with the CPNI requirements; and
- Establishing procedures for notifying the FCC, law enforcement and customers in the event of any breaches of CPNI.

To China Unicom's knowledge ,no CPNI was obtained by any data broker or unauthorized third party in 2018. China Unicom took no actions (proceedings instituted or petitions filed at state commissions, the court system, or at the Commission) against data brokers in 2018, and it received no customer complaints in 2018 regarding the unauthorized release of CPNI.

Signed: 

Date: Feb 22 2019