



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

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year of 2017

Date filed: February 27, 2018

Name of company covered by this certification: Globecomm Systems Inc.

Form 499 Filer ID: 824200

Name of signatory: Julia Hanft

Title of signatory: Executive Vice President and General Counsel

Certification:

I, Julia Hanft, Executive Vice President and General Counsel, Globecomm Systems Inc. (the "Company"), certify that I am an officer of the Company, 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. §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, recordkeeping, and supervisory review) 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.

The Company has not received any 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 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.

Signed: Julia Hanft Date: 27-Feb-2018

Julia Hanft
Executive Vice President & General Counsel
Globecomm Systems Inc.

GLOBECOMM SYSTEMS INC.
ISO 9001 CERTIFIED

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Attachment 1: Statement Concerning Company Procedures

Globecomm Systems Inc. ("Globecomm") protects customer proprietary information ("CPNI") by utilizing the following procedures:

1. Globecomm conducts annual ethics training for all employees. This includes training on proper protection of customer proprietary information. All employees sign a Non-Disclosure Agreement upon being hired and the annual training includes reminders of their legal obligations under those NDAs.
2. Any CPNI is to be stored in protected areas and provided only to those with a need to know. To ensure that any CPNI is not accidentally disclosed, CPNI is to be destroyed as soon as it is no longer required for Globecomm to provide service to the customer.
3. In 2017, Globecomm did not use CPNI for any purpose other than to provide services to customers, and did not sell or transfer CPNI to any third party. Globecomm will not use CPNI for any purposes that are inconsistent with FCC rules.
4. Customers are to have access to their own CPNI only through a secure web portal that requires a username and password access. Usernames and passwords are only provided to customers who have been authenticated through Contracts or Program Management.
5. Globecomm's policy is to provide immediate notification to a customer by email if we believe any of the customer's proprietary information has been compromised. Any report from a customer who believes its proprietary information has been compromised is immediately forwarded to the General Counsel's office for investigation.

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