

ANNUAL § 64.2009(e) CPNI CERTIFICATION FOR 2018

1. Date filed: February 28, 2019
2. Name of company(s): SatCom Global, Inc.
3. Form 499 Filer ID: 823974
4. Name of signatory: Steven Griffin
5. Title of signatory: President
6. Certification:

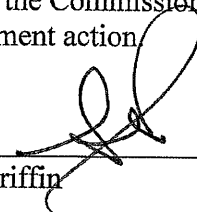
I, Steven Griffin, certify that I am an officer of SatCom Global, Inc. ("SatCom"), and acting as an agent of SatCom, that I have personal knowledge that SatCom has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is a statement explaining how SatCom's procedures ensure that SatCom 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.

SatCom 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 in the past year.

SatCom has not received customer complaints in the past year concerning the unauthorized release of CPNI.

SatCom 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. SatCom 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.



Steven Griffin
President
SatCom Global, Inc.

Date: Feb 28th 2019

STATEMENT OF CPNI COMPLIANCE PROCEDURES

SatCom Global, Inc. ("SatCom") has established and implemented the following internal policies and procedures to ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with Federal Communications Commission rules governing Customer Proprietary Network Information ("CPNI"), codified at 47 C.F.R. § 64.2001 *et seq.*

The following operating procedures are intended to ensure that SatCom complies with the CPNI Rules:

1. SatCom does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by the law.
2. SatCom only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. SatCom does not use its customers' CPNI for any marketing purpose, either internal or external, or any other purpose set forth in the CPNI Rules.
3. SatCom has established the following practices and procedures governing the disclosure of CPNI:
 - (a) SatCom does not disclose or release CPNI upon a customer's telephone request except under the following circumstances: (1) SatCom verifies the identity of the caller by return call to the telephone number of record in the customer's file; (2) SatCom sends the CPNI to the customer's address of record in the customer's file; or (3) for business customers, through the customer's dedicated account manager.
 - (b) SatCom automatically notifies customers (at the customer's original telephone number or address on file) in case any changes are made to the customer's primary account information.
 - (c) SatCom has implemented procedures to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach.
4. SatCom provides comprehensive training on these practices and procedures to all relevant employees. SatCom has established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations. SatCom maintains records of carrier compliance for a minimum of one year.
5. Because SatCom does not use CPNI for any purpose and does not provide CPNI to other entities (except when compelled under the law to do so, or as requested to do by customers), it has not implemented either "opt-in" or "opt-out" CPNI

approval procedures, *see* 47 C.F.R. § 64.2007, and it has not implemented the CPNI notification procedures, *see* C.F.R. § 64.2008.

6. In the event that SatCom in the future plans to utilize CPNI to provide CPNI to other entities other than as described above, it will first provide customers notification of their CPNI rights as required by 47 C.F.R. § 64.2008.
7. It is a violation of SatCom policies to disclose CPNI outside of SatCom. Any employee found to have violated this policy will be subject to disciplinary action up to and including termination.
8. Access to CPNI at SatCom is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.
9. Controls are in place involving responses to law enforcement agencies that serve SatCom with valid legal demands, such as a court ordered subpoena, for CPNI. SatCom will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.