

Tata Communications (Guam) Inc.
Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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

Date filed: February 28, 2019

Name of company covered by this certification: Tata Communications (Guam) L.L.C.

Form 499 Filer ID: 832266

Name of Signatory: David Ryan

Title of signatory: Senior Vice President

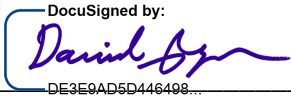
I, David Ryan, certify that I am an officer of the company named above ("TC Guam"), and acting as an agent of TC Guam, that I have personal knowledge that TC Guam has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et 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, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

TC Guam has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year.

TC Guam has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

TC Guam 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. TC Guam 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 
 DocuSigned by: DE3E9AD5D446498...
David Ryan, Senior Vice President

Attachment: Accompanying Statement explaining CPNI procedures

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Accompanying Statement

Tata Communications (Guam) Inc. ("TC Guam") is primarily an international carrier serving other carriers, Internet service providers and large enterprise customers. TC Guam typically transports the "middle" segment only of circuit-switched voice or Voice over Internet Protocol ("VoIP") international calls. Tata Communications interconnects with U.S. interexchange carriers at the carrier hotel level (above the access tandem level) where traffic is handed off to Tata Communications by its carrier customers, and then Tata Communications transports that traffic to another interexchange carrier, usually overseas, for ultimate termination. Tata Communications also transports traffic, handed off to Tata Communications overseas by foreign carriers, into the U.S. Once the traffic is in the U.S., Tata Communications hands off the traffic to another carrier, which directly or indirectly terminates the traffic. Tata Communications also provides a wide range of information and voice and data telecommunications services to enterprise customers by means of direct access arrangements connecting such customers with Tata Communications' network.

Tata Communications' policy is to not use CPNI in outbound marketing campaigns in a manner that would require customer consent. Typically, new customers come to Tata Communications seeking the best price for their voice termination requirements. Tata Communications first signs a nondisclosure agreement with the prospective customer and then markets to them using Tata Communications' prices for traffic termination destinations served. Enterprise or wholesale voice transport carrier prospects that Tata Communications contacts (*i.e.*, that do not contact us first) generally are identified through public sources such as industry magazines. Tata Communications may initiate contact with the customer using CPNI for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services.

Furthermore, Tata Communications does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third party is strictly prohibited except for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of Tata Communications, or pursuant to legal process.

Tata Communications is committed to protecting the confidentiality of all customer information, including CPNI. Tata Communications has implemented password protection for customer access to account information. Tata Communications' individual customer contracts contain confidentiality and personal data protection requirements regarding the treatment of customer account information, including CPNI, and Tata Communications employees are prohibited from disclosing such information. All Tata Communications personnel have certified in writing that they have read and will adhere to the Code of Conduct ("Code"), which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of

employment. In fact, as part of an overall program of legal compliance training for Tata Communications employees, Tata Communications has instituted a web-based, as well in-person training programs that instruct employees on a variety of legal compliance matters, including regular trainings related to the Code and handling and maintaining confidentiality of personal information of customers. Additionally, at the time of hiring, all new personnel must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. Tata Communications personnel, who are authorized to access CPNI, are trained in the authorized uses of this information.

Tata Communications is prepared to comply with applicable breach notification laws in the event of a CPNI breach.