



February 15, 2018

**Annual CPNI Compliance Certification  
For Huntleigh Technology Group, Inc.**

I, Ross Dahman, being of lawful age and duly sworn, on my oath state that I am President of Huntleigh Technology Group, Inc. I attest that, as an officer of Huntleigh Technology Group, Inc., I am authorized to execute this CPNI Compliance Certification on the company's behalf.

I do, therefore, state the following:

I, Ross Dahman, have personal knowledge that Huntleigh Technology Group, Inc.'s business methods, and the procedures adopted and employed by the company are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the Federal Communications Commission's regulations implementing Section 222 of the Act, 47 C.F.R. § 64.2005, 64.2007 and 64.2009.

Furthermore, I certify that, based upon my personal knowledge of these procedures, my company's personnel are trained on these procedures and that these procedures ensure that the company is in compliance with the rules in Title 47-Telecommunications, Sections 64.2001 through 64.2009.

*Ross Dahman* FEB. 15, 2018

Signature, Ross Dahman, President, Officer of: Huntleigh Technology Group, Inc., Date

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# Accompanying Statement to Annual CPNI Compliance Certification for:

## Huntleigh Technology Group, Inc.

In compliance with 47 C.F.R. § 64.2009(e), I, Ross Dahman, acting on behalf of Huntleigh Technology Group, Inc., certify the Company has taken the following actions:

### Employee Training and Discipline

- Trained all employees and personnel as to when they are and are not authorized to use CPNI.
- Instituted an express disciplinary process for unauthorized use of CPNI.

### Sales and Marketing Campaign Approval

- Guaranteed that management approves all sales and marketing campaigns.

### Record-Keeping Requirements

- Established a system to maintain a record of all sales and marketing campaigns that use theft customers' CPNI, including marketing campaigns of affiliates and independent contractors.
- Ensured that these records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Made certain that these records are maintained for a minimum of one (1) year.

### Establishment of a Supervisory Review Process

- Established a supervisory review process for all outbound marketing situations.
- Certified that under this review process, all sales personnel obtain supervisor approval of any proposed outbound marketing request for customer approval.
- Guaranteed that the Company only discloses CPNI to agents, affiliates, joint venture partners, independent contractors or to any other third parties only after receiving "opt in" approval from a customer.
- Verified that the Company enters into confidential agreements with joint venture partners, independent contractors or any other third party when releasing CPNI.

### Opt Out Mechanism Failure

- Established a protocol through which the Company will provide the FCC with written notice within five (5) business days of any instance where opt out mechanisms do not work properly, to such a degree that consumers' inability to opt out is more than an anomaly.

### Compliance Certificates

- Executed a statement, signed by an officer, certifying that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the FCC's CPNI regulations.
- Executed a statement detailing how operating procedures ensure compliance with CPNI regulations.
- Executed a summary of all customer complaints received in the past year concerning unauthorized release of CPNI.

#### Customer Authentication Methods

- Instituted customer authentication methods to ensure adequate protection of customers' CPNI. These protections only allow CPNI disclosure in accordance with the following methods:
  - Disclosure of CPNI information in response to a customer providing a pre established password;
  - Disclosure of requested CPNI to the customer's address or phone number of record; and
  - Access to CPNI if a customer presents a valid photo ID at the carrier's retail location.

#### Customer Notification of CPNI Changes

- Established a system under which a customer is notified of any change to CPNI. This system, at minimum, notifies a customer of CPNI access in the following circumstances:
  - password modification,
  - a response to a carrier-designed back up means of authentication,
  - online account changes, or
  - address of record change or creation.

#### Notification to Law Enforcement and Customers of Unauthorized Access

- Established a protocol under which the appropriate Law Enforcement Agency ('LEA') is notified of any unauthorized access to a customer's CPNI.
- Ensured that all records of any discovered CPNI breaches are kept for a minimum of two (2) years.

# Summary of Actions Taken Against Databrokers by Huntleigh Technology Group, Inc.

In compliance with 47 C.F.R. 64.2009(e) I, Ross Dahman, acting on behalf of Huntleigh Technology Group, Inc., summarize the actions that the Company has taken against databrokers within the last year:

*Detailed list of "any actions" taken against pretexters or databrokers.*

*The term "any actions," means: proceedings instituted or petitions filed by a carrier at either state commissions, the court system, or at the Federal Communications Commission against data brokers.*

*For example:*

*1) On October 2, 2007, 'ABC Company "filed a complaint in the Federal District Court of New Jersey against 'John Doe "for attempting to obtain customers' CPNI information through 'fraud, trickery, and deceit." This case is entitled ABC Company v. John Doe, Case No. 07.12345-67.*

**No such actions taken against databrokers within the last year**