

**Annual Certification of Compliance with  
Protection of Customer Proprietary Network Information Rules  
in Accordance with 47 C.F.R. § 64.2009(e)  
EB Docket 06-36**

**Includes:**

**Statement Explaining How Operating Procedures Ensure Regulatory Compliance,  
Explanation of Any Actions Taken Against Data Brokers, and  
Summary of all Customer Complaints Received**

Jack Briggs executes this Certificate of Compliance in accordance with § 222 of the Telecommunications Act of 1996, as amended, 47 U.S.C. 222, and 47 C.F.R. 64.2009, on behalf of Jaguar Communications, Inc. ("Jaguar"), related to the previous calendar year, namely: 2017.

This Certificate of Compliance, filed on March 1, 2018, addresses the requirement of 47 C.F.R. 64.2009 that Jaguar provide:

- A "statement accompanying the certificate" to explain how its operating procedures ensure compliance with 47 C.F.R., Part 64, Subpart U;
- An explanation of any actions taken against data brokers; and
- A summary of all customer complaints received in the past year concerning the unauthorized release of customer proprietary network information ("CPNI").

**On Behalf Of Jaguar, I Certify As Follows:**

1. I am the Chief Financial Officer of Jaguar and I am acting as an agent of Jaguar. My business address is 213 South Oak Avenue, Owatonna, Minnesota 55060. Jaguar's Form 499 Filer ID is 820958.

2. I have personal knowledge of the facts stated in this Certificate of Compliance and that Jaguar has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission") rules relating to CPNI, namely: 47 C.F.R. 64.2001 *et seq.*

**Jaguar's Operating Procedures Ensure Regulatory Compliance**

***CPNI Safeguards***

3. Jaguar has designated a compliance officer to maintain and secure Jaguar's CPNI records and to supervise training of all company employees.

4. Jaguar trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and how to safeguard CPNI. Jaguar has an express disciplinary process in place if the rules are violated.

5. Jaguar authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

6. Jaguar discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

7. Jaguar discloses CPNI to a customer in person at its office location only when the customer presents a valid photo ID and the ID matches the name on the account.

8. Jaguar establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

9. Jaguar has established password protection for customers' online accounts.

10. Jaguar includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

11. Jaguar notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

### ***Use of CPNI in Marketing***

12. Jaguar does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. Jaguar uses, discloses or permits access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

13. Jaguar has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Each customer's record contains a designation identifying whether we have obtained, through the processes permitted by the FCC's rules, the customer's approval to use, disclose or permit access to his or her CPNI.

### ***CPNI Recordkeeping and Reporting***

14. Since Jaguar does not utilize customer CPNI in sales and marketing campaigns, nor does Jaguar allow its affiliates to utilize such information, Jaguar has no need to maintain records about CPNI disclosure to third parties, because no such disclosures are made. Jaguar maintains records of its compliance with the FCC's CPNI Rules for use of CPNI in outbound marketing efforts, for at least one year.

15. Jaguar is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. Jaguar may also notify the customer of such breach, after consulting with the investigatory agency(ies), if Jaguar believes there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm.

Jaguar will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that Jaguar postpone disclosure to the customer.

16. Jaguar will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.

#### **Explanation of Actions Against Data Brokers**

17. Jaguar has not encountered any circumstances requiring it to take any action (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against a data broker during the year to which this Certificate pertains.

#### **Summary of all Customer Complaints Received**

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

19. Jaguar does not at this point have any specific information on the processes pretexters are using to attempt to access its Customer's CPNI.

Jaguar represents and warrants that this certification is consistent with 47 C.F.R. 1.17, which requires truthful and accurate statements to the Commission. Jaguar 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.

Date 2-28-18

Signed   
Jack Briggs, CFO

