

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

EB Docket 06-36

Annual § 64.2009(e) CPNI Certification for 2019

Date filed: February 28, 2019

Name of company covered by this certification: TransPac Telecom, Inc.

Form 499 Filer ID: 826851

Name of signatory: Mark Nakatsukasa

Title of signatory: President

I, Mark Nakatsukasa, certify that I am an officer of the company named above, 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 set forth in § 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. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed s/ Mark Nakatsukasa

CPNI Compliance Statement

TransPac Telecom, Inc. (“TransPac”) provides communications services through the issuance of prepaid calling cards (“prepaid cards”). TransPac sells these prepaid cards in bulk to distributors (retail locations such as convenience stores and drug stores). TransPac’s distributors then sell the prepaid cards to end users, who use the prepaid cards to make telephone calls. Thus—assuming they retain information regarding their the identity of customers—only TransPac’s distributors would have access to individually-identifiable information regarding TransPac’s end-user customers. These distributors would not, however, have access to any information regarding the end user-user customers’ use of the prepaid services.

Based on this chain of distribution, TransPac is not privy to any customer proprietary network information (“CPNI”), or “information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer.” 47 U.S.C. § 222(h)(1). Because TransPac does not have access to any CPNI, TransPac’s personnel **cannot** engage in any unauthorized use or disclosure of CPNI, and TransPac **is** in compliance with § 64.2001, *et seq.* of the Commission’s Rules.