



FOREMOST CLOUD SERVICES, INC.
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Dallas, Texas 75240-4605
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Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: March 1st, 2018
2. Name of company covered by this certification: FOREMOST CLOUD SERVICES, INC., and affiliates
3. Form 499 Filer ID: 830866
4. Name of signatory: John Paul Baremore
5. Title of signatory: General Counsel
6. Certification:

I, John Paul Baremore, certify that I am an officer of the company named above, and acting as an agent of the company, I further certify that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules in accord with 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, including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review.

The company has not taken action against any data brokers in the past year, including any proceedings instituted or petitions filed by the company at any state commissions, courts, or at the FEDERAL COMMUNICATIONS COMMISSION.

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

The company 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. The company also acknowledges that false statements and misrepresentation to the Commission are punishable under the Title 18 of the UNITED STATES CODE and may subject it to enforcement action.

Signed on March 1st, 2018

A handwritten signature in blue ink, appearing to read "John Paul Baremore", written over a horizontal line.

John Paul Baremore
General Counsel, FOREMOST CLOUD SERVICES, INC.
baremore@cloudfore.net

enclosure: *Policies and Operating Procedures Used to Ensure Compliance With FCC Rules Concerning CPNI*

POLICIES AND OPERATING PROCEDURES USED TO ENSURE COMPLIANCE WITH FCC RULES REGARDING CPNI

1. FOREMOST CLOUD SERVICES, INC., (hereinafter "FOREMOST") as a matter of policy does not make Customer Proprietary Network Information (hereinafter "CPNI") available to any third-party except as necessary to provide service, to comply with any applicable interconnection and inter-carrier requirements, and as routinely disclosed at the signaling layer.
2. As CPNI is not disclosed to third-parties except as provided above, FOREMOST is not required to provide its customers with a notice or a mechanism to opt out of the use of their CPNI by third-parties. Any changes to this policy allowing such disclosure to third-parties shall require the adoption of a notice to the customer, a mechanism for the customer to opt out of such disclosure, and status reporting, all in accord with 47 C.F.R. §64.2001, *et seq.*
3. FOREMOST does not use CPNI for external sales or marketing campaigns. Further, FOREMOST personnel are not authorized to conduct any sales or marketing efforts which use CPNI, and do not have access to systems where CPNI is stored and maintained. Any changes or exceptions to this policy may require record-keeping and a supervisory review process as required by 47 C.F.R. §64.2001, *et seq.* The President of FOREMOST may direct and supervise internal sales efforts that may use CPNI on a case-by-case basis to provide or market service offerings among the categories of service to which an existing FOREMOST customer already subscribes (e.g. contract renewals), and all such activity is required to be recorded and maintained in accord with 47 C.F.R. §64.2001, *et seq.*
4. All FOREMOST personnel are trained that CPNI may only be used for allowed purposes, as narrowly defined herein, and are aware that the unauthorized use of CPNI shall be grounds for dismissal. All personnel are required to review and sign training documents defining CPNI, the appropriate procedures to ensure compliance, and the disciplinary process that shall be undertaken for failure to comply with CPNI rules.
5. CPNI is protected from unauthorized access and use. Systems that are used to store and maintain CPNI are firewalled from the public internet and data is protected at the network level using VPN technology. Only information associated with individual login sessions is stored on workstations and all data repositories are centralized on servers. Data is segregated at the server level, such that FOREMOST personnel who do not have access to CPNI also do not have accounts on servers where CPNI is stored. Backups are encrypted with password protection. Login credentials are controlled and are changed periodically. Hardcopies are not produced except in a directed manner, such as for a particular customer for an authorized use. Hardcopies produced for temporary use (e.g., installation and maintenance activities) are destroyed after use.
6. Supervisory review at the highest level exists to ensure the foregoing policies and procedures are followed.
7. FOREMOST does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.