

**Annual 47 CFR § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

RE: Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: March 1, 2018
2. Name of company(s) covered by this certification: Global Connection Inc. of America d/b/a Stand Up Wireless
3. Form 499 Filer ID: 827598
4. Name of signatory: Eric Schimpf
5. Title of signatory: Chief Operating Officer
6. Certification:

I, Eric Schimpf, 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 CFR §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 §64.2001 *et seq.* of the Commission's rules.

The company **has not** taken actions (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 data brokers in the past year.

The company **has not** received 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 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the US. Code and may subject it to enforcement action.

Signed:

Printed Name: Eric Schimpf

Title: Chief Operating Officer



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**Attachments:** Accompanying Statement explaining CPNI procedures

## **ATTACHMENT A**

### **STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

#### **Global Connection Inc. of America d/b/a Stand Up Wireless**

Global Connection Inc. of America d/b/a Stand Up Wireless ("Global" or "Company") provides the following as its Statement of CPNI Procedures and Compliance.

Global does not use or disclose CPNI for any sales or marketing related purposes or activities and does not disclose CPNI to third parties.

The Company has adopted policies and procedures to safeguard its customers' CPNI from improper use or disclosure by employees; and to protect against attempts by third parties to gain unauthorized access to CPNI.

User account information can only be accessed by authorized representatives of the company. Such authorized representatives have access to the customer records management systems only via an established password protected account set-up in their name by a system administrator.

When the Company agent accesses customer information of any type, an audit log is created on the account that indicates the company agent that accessed the records. Call detail information is only disclosed to customers. If a customer requests CPNI related information, a customer service representative must verify all the following information contained in our records: name, social security number, date of birth, and the address. Additionally, customers must certify that they are the account holder on file. Once this information is confirmed, the request is sent to a Manager for review. If the request is approved, only then will the manager provide the CPNI related information to the account holder.

The Company has not taken any actions against data brokers in the last year.

Global has procedures in place to notify law enforcement (United States Secret Service (USSS) and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications of CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year and has had no reports of pretexters attempting to gain access to CPNI anytime during 2017.