

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

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2017

Date filed: March 1, 2018

Name of company covered by this certification: Geo-Group Communications, Inc.

Form 499 Filer ID: 824834

Name of signatory: Kumar Bhavnani

Title of Signatory: President

I, Kumar Bhavnani, 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 the following statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

As a reseller of prepaid phone cards, the company does not have access to CPNI's or other type customer information. Therefore the risk of unauthorized access to CPNI is minimal. In the event the company comes into access to CPNI, the company's policy is to never give out the information without the express written consent of the customer.

The company has not taken any actions 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 disclosures 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   
Kumar Bhavnani, President

## Venkat Ganapathy

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**From:** David Hinton <dhinton@hkgcpa.com>  
**Sent:** Monday, March 5, 2018 11:02 AM  
**To:** Venkat Ganapathy  
**Subject:** FW: Geo Group  
**Attachments:** Geo Group Annual 47 C-2017.pdf

Venkat-just following up on the enclosed and my prior email.

Can you pls ask Kumar to sign and email back to me?

We will then file it.

Thx  
David

**From:** Brian Kim  
**Sent:** Monday, March 05, 2018 10:51 AM  
**To:** David Hinton <dhinton@hkgcpa.com>  
**Subject:** Geo Group

David,

I have not received back the signed CPNI FCC Certification from Kumar for Geo Group.

Brian Kim  
Certified Public Accountant



Certified Public Accountants  
**PLEASE NOTE OUR NEW ADDRESS!**  
100 W. Walnut Street 7th Floor  
Pasadena, CA 91124  
Phone: (626) 585-0666  
Direct: (626) 389-1241  
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