

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016

Date filed: February 24, 2016

Name of company covered by this certification: SpaceCom International, LLC

Form 499 Filer ID: 827673

Name of signatory: Matthew DeNapoli

Title of signatory: President

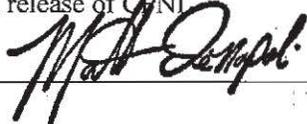
I, Matthew DeNapoli, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules at 47 C.F.R. § 64.2001 *et 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 section 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. The Company has no information with respect to the processes pretexters are using to attempt to access CPNI, or 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.

Signed _____



SpaceCom Procedures for Disclosure of CPNI

SpaceCom is committed to maintaining the privacy of its customers and protecting their CPNI and other customer data. The procedures we follow are set out below.

WHAT IS PROTECTED

SpaceCom has a duty, under federal law, to protect the confidentiality of certain types of customer proprietary network information (CPNI), including: (1) information about the quantity, technical configuration, type, destination, location, and amount of use of a Customer's services, and (2) information concerning services a Customer receives. CPNI includes information typically available from the telecommunications-related details on a monthly bill, such as technical information, type of service, current charges, long distance and local service billing records, directory assistance charges, usage data and calling patterns.

HOW IT IS PROTECTED

SpaceCom does not use third party marketing organizations.

SpaceCom's protection of CPNI begins with training. All our employees and staff members are trained on how CPNI is to be protected and when it may or may not be disclosed. Violation of this CPNI policy by any employee will result in disciplinary action against that employee.

SpaceCom has different procedures in place depending on the method by which a party seeks access to CPNI.

Initial Verification

SpaceCom authenticates each customer's identity upon service initiation. We do not have individuals as customers, and we have only a relatively small number of corporate and carrier customers, all of whom we know. We do not use readily available personal information or account information in setting up the procedure for subsequent authentication for purposes of making account changes or allowing the customer access to CPNI related to its account. The customer may not obtain access to its account information online.

No Telephone Access to CPNI

SpaceCom has a strict policy and will not release CPNI over the telephone during customer-initiated telephone contact.

Internet Access

To get access to information such as bandwidth usage, call detail records and other customer proprietary information, all customers must request the data and we will send it to them over the Internet. The email address used is the one already on record, which was obtained from the customer upon service initiation.

Lost or Forgotten Passwords

Lost or forgotten passwords are not an issue, as we do not use them to verify a customer's identity.

Notification of Account Changes

SpaceCom notifies its customers immediately by email or by telephone whenever there is CPNI-related account activity, such as a password change or the change of the address of record. The first notification is sent to the customer upon activation of service. Subsequent notifications are made by telephone or sent to the customer at the then-current email address of record, and do not reveal the changed information.

Business and Wholesale Customers

The procedures set forth above apply in all cases, since all our customers are business or wholesale customers.

Use of CPNI For Marketing Purposes

At this time, SpaceCom does not use CPNI to engage in any marketing activities. If SpaceCom begins using CPNI for marketing purposes, the Company will establish a supervisory review process to ensure that its use of CPNI with Section 222 of the Communications Act, 47 U.S.C. § 222, and the Federal Communications Commission's CPNI rules.

BREACH OF CPNI PRIVACY

In the event SpaceCom experiences a privacy breach and CPNI is disclosed to unauthorized persons, federal rules require SpaceCom to report such breaches to the U.S. Secret Service and the FBI. Any SpaceCom employee learning of such a breach must notify senior management immediately. SpaceCom will notify law enforcement no later than seven (7) business days after it has reasonably determined that such breach has occurred by sending electronic notification to the United States Secret Service and the FBI through the central reporting facility at www.fcc.gov/eb/cpni.

No employee shall notify any customer of a breach without written authorization from the president of SpaceCom. By law, SpaceCom cannot inform its customers of the CPNI breach until at least seven (7) days after notification has been sent to law enforcement, or

later if the law enforcement agency tells it to postpone disclosure pending investigation.

SpaceCom is required to and will maintain records of any discovered CPNI breaches, the date that it discovered the breach, the date it notified law enforcement and copies of the notifications to law enforcement, a detailed description of the breach, including the circumstances of the breach, and law enforcement's response (if any) to the reported breach. SpaceCom will retain these records for a period of not less than two (2) years.

NOTIFICATION OF CHANGES TO THIS POLICY

If we change this CPNI Policy, we will post those changes to our website or in other places we deem appropriate, so that our customers can be aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.