

GTA TELECOM, LLC

**GTA Telecom, LLC 499 Filer ID 812608
GTA Services, LLC 499 Filer ID 825746
Pulse Mobile, LLC 499 Filer ID 825747**

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**2011 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 27, 2012**

This statement accompanies the 2011 Customer Proprietary Network Information (“CPNI”) Certification, for the affiliated companies listed above (individually and collectively “Company”) as required by Section 64.2009(e) of the Federal Communications Commission’s (“FCC’s”) rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC’s rules. *See* 47 C.F.R. § 64.2001 *et seq.*

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any disaggregation or refinement based on CPNI.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company does not use CPNI for marketing and thus, at this time has not provided notice regarding Opt-Out. Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out process. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process. The Company has trained employees regarding prohibitions on use of CPNI for marketing. Prior to initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining

customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008.

6. Record of Customer CPNI Approval/Non-Approval

At such time as Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has in place procedures for compliance with Section 64.2010 including, but not limited to the procedures listed below:

The Company has implemented procedures for authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable. No actions taken against data-brokers.
No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.

**SUMMARY OF CUSTOMER COMPLAINT
GTA TELECOM, LLC
FEBRUARY 27, 2012**

According to the attached CPNI Certification, GTA Telecom, LLC hereby submits its findings into a complaint made by a customer concerning their call records being possibly accessed by the ex-husband and his common law wife:

1. Issue: CPNI accessed by an employee outside their assigned duties and/or responsibilities.
2. Date: The initial complaint 13 Sept. 2011, verbal complaint from customer concerning ex-husband and his common law wife possibly accessing customer's call records. Ex-husband and common law wife were both GTA employees. Initially seen by the HR department as a personal and family issue as customer had been disconnected according to GTA policy for nonpayment, no formal written complaint was received. Customer complained again to call center December 29th. This incident was brought from Call Center to Human Resource (HR) department, and this time the customer provided a formal written complaint. HR contacted the Security Officer on 3 Jan. 2012, and a formal investigation began.

The review of files identified common-law wife had accessed customer's account despite a personal relationship with the customer and had personally set the account to be disconnected outside her duties. Additionally, CPNI database records indicated she had accessed her common law husband's account over 662 times, her own account 162 times, and a boyfriend of a friend's account 124 times over an 8 month period. When employee was interviewed 16 Jan 2012 there was no compelling evidence showing these actions were in the performance of her duties, upon further discussion she admitted she should not have been accessing the accounts. She is no longer employed by GTA.

3. Actions taken: According to GTA National Security Agreement, DHS-Team Telecom was notified via email and acknowledged receipt the email. Also according to section 11 of GTA 2011 Annual Statement of FCC CPNI Rule Compliance the account holder has been orally notified.
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