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BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

EB Docket No. 06-36

Re: CERTIFICATION OF CPNI COMPLIANCE FILING – March 1, 2013

Teleguam Holdings, LLC 499 Filer ID # 812608
(fka GTA Telecom, LLC and fka Pulse Mobile, LLC)

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

GTA Telecom, LLC has undergone a corporate restructure whereby regulated local exchange service is now provided under Teleguam Holdings, LLC. Additionally, the wireless operations formerly provided by Pulse Mobile, LLC is now provided by Teleguam Holdings, LLC. Therefore, the services formerly provided by GTA Telecom, LLC and Pulse Mobile, LLC are now provided by Teleguam Holdings, LLC.

Sincerely,

John Kuykendall
Vice President
jkuykendall@jsitel.com

Attachment

cc: Best Copy and Printing, Inc. *via email to fcc@bcpiweb.com*

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Teleguam Holdings, LLC

624 North Marine Corp Dr., Tamuning, GU 96913 671-644-1020

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

EB Docket 06-36

Annual 64.2003(e) CPNI Certification for 2012

Date signed: February 28, 2013

Names of Companies Covered by this Certification:

499 Filer ID

Teleguam Holdings, LLC
(fka GTA Telecom, LLC and fka Pulse Mobile, LLC)

812608

Name of signatory: ***Duncan C. Leuenberger, Sr.***

Title of signatory: ***Network Security, VP***

I, ***Duncan C. Leuenberger, Sr.*** 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 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, recordkeeping, and supervisory review) set forth in section 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 received one (1) formal, written customer complaint in the past year concerning the unauthorized release of CPNI. (See Incident Report titled ***GTA Security Incident 2012-01***)

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 misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed:  _____

Attachment

TELEGUAM HOLDINGS, LLC

**Teleguam Holdings, LLC
(fka GTA Telecom, LLC and fka Pulse Mobile, LLC) 499 Filer ID 812608**

624 North Marine Corp Dr., Tamuning, GU 96913 671-644-1020

**2012 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE
February 28, 2013**

This statement accompanies the 2012 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.

The company has received one (1) formal, written customer complaint in the past year concerning the unauthorized release of CPNI. (See *2012 Annual Security Report* and emailed Incident Report titled *GTA Security Incident 2012-01*)

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.

GTA Security Incident 2012-01

Summary Report

Pursuant to 47 C.F.R. § 64.2009(e), TeleGuam Holdings, LLC hereby submits the following summary of the one (1) formal written customer complaint that it received in the past year concerning the unauthorized release of CPNI.

In January 2012, a formal written complaint was submitted by a customer alleging that her ex-husband and his common-law wife, both employed by TeleGuam Holdings, LLC (then known as GTA Telecom, LLC), had been accessing the customer's call detail records for reasons unrelated to the provision of telecommunications services. The company immediately began an investigation which determined that the GTA employee (complainant's ex-husband's common-law wife) had accessed call detail records IAW GTA disconnection policies. Her actions did not disclose any CPNI information nor did she access the complainant's account outside of a normal employee role nor was it accessed by the ex-husband. It was discovered that her actions fell outside her duties which violated GTA policies and during the investigation it was identified she had wrongfully accessed call detail records of her common-law husband (the complainant's ex-husband). Her employment was terminated for accessing accounts of customers and employees that she had a personal relationship with not for disclosing CPNI information.

To ensure that such actions do not occur in the future, the company has taken the following actions: (1) revised CPNI training materials to include what occurred so that all employees can better understand explicitly how and when CPNI can be accessed and the ways that it cannot be accessed; (2) taken actions to ensure that supervisors take more diligent efforts to ensure that those that report to them are in compliance with policies and procedures related to CPNI; (3) continued to investigate what has occurred and make additional adjustments in policies and training as necessary.