

US Signal Company, LLC

Payment Card Industry (PCI)
Data Security Standard
Attestation of Compliance for
Onsite Assessments -Service Providers

July 30, 2023



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

Revision 2

September 2022



Document Changes

Date	Version	Description
September 2022	3.2.1 Revision 2	Updated to reflect the inclusion of UnionPay as a Participating Payment Brand.



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS)*. Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

Part 1. Service Provider and Qualified Security Assessor Information

Part 1a. Service Provider Organization Information

Company Name:	US Signal Company, LLC	DBA (doing business as):	
Contact Name:	Trevor Bidle	Title:	Chief Information Security Officer
Telephone:	616-988-7461	E-mail:	securityofficer@ussignal.com
Business Address:	201 Ionia Street SW	City:	Grand Rapids
State/Province:	MI	Country:	USA
		Zip:	49503
URL:	https://ussignal.com		

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	BDO USA		
Lead QSA Contact Name:	Brian Hill	Title:	Managing Director
Telephone:	612-367-3128	E-mail:	bhill@bdo.com
Business Address:	800 Nicollet Mall Suite 600	City:	Minneapolis
State/Province:	MN	Country:	USA
		Zip:	95054
URL:	https://www.bdo.com		



Part 2. Executive Summary

Part 2a. Scope Verification

Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) assessed:	Hosting and managed services	
Type of service(s) assessed:		
Hosting Provider: <input type="checkbox"/> Applications / software <input checked="" type="checkbox"/> Hardware <input checked="" type="checkbox"/> Infrastructure / Network <input checked="" type="checkbox"/> Physical space (co-location) <input checked="" type="checkbox"/> Storage <input type="checkbox"/> Web <input checked="" type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services (specify): <input checked="" type="checkbox"/> Systems security services <input checked="" type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> Others (specify):		

Note: These categories are provided for assistance only, and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.


Part 2a. Scope Verification (continued)
Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) not assessed:	Not applicable.	
Type of service(s) not assessed:		
Hosting Provider: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> Others (specify):		
Provide a brief explanation why any checked services were not included in the assessment:	Not applicable.	

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	US Signal is a colocation and a managed services provider to businesses. For colocation customers, US Signal provides space in its data centers, and provides power, physical security, and Internet connectivity. US Signal also offers managed services, which may include cloud, managed firewall, backup, network and system administration, and other services. US Signal does not directly interact with cardholder data.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	US Signal does not store, process or transmit cardholder data. US Signal does have administrative access to some systems that are within scope for its clients' PCI DSS compliance, and is therefore, assessing as a service provider for those services.



Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

Type of facility:	Number of facilities of this type	Location(s) of facility (city, country):
<i>Example: Retail outlets</i>	3	<i>Boston, MA, USA</i>
US Signal Corporate Office	1	Grand Rapids, MI
US Signal Data Center	1	Southfield, MI
US Signal Data Center	1	Indianapolis, IN
US Signal Data Center	1	Kentwood, MI
US Signal Data Center	1	Byron Center, MI
US Signal Data Center	1	Madison, WI
US Signal Data Center	1	Oakbrook, IL
US Signal Data Center	1	South Bend, IN
US Signal Data Center	1	Belleville, MI

Part 2d. Payment Applications

Does the organization use one or more Payment Applications? Yes No

Provide the following information regarding the Payment Applications your organization uses:

Payment Application Name	Version Number	Application Vendor	Is application PA-DSS Listed?	PA-DSS Listing Expiry date (if applicable)
Not applicable.	Not applicable.	Not applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not applicable.
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	



Part 2e. Description of Environment

Provide a **high-level** description of the environment covered by this assessment.
 For example:

- *Connections into and out of the cardholder data environment (CDE).*
- *Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.*

US Signal is a colocation and a managed services provider to businesses. US Signal does not directly interact with cardholder data.
 The PCI environment is separate from the corporate environment.
 Technologies that protect and provide services to the CDE environment include:

- Networking devices – used for controlling, managing, and monitoring traffic.
- Multi-factor authentication (MFA) – for remote access and non-console access to systems for user and administrative authentication.
- Domain controllers, intrusion detection, logging, security monitoring (alerting), anti-virus, file integrity monitoring, patch management, and vulnerability management.

Does your business use network segmentation to affect the scope of your PCI DSS environment? <i>(Refer to “Network Segmentation” section of PCI DSS for guidance on network segmentation)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Part 2f. Third-Party Service Providers

Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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If Yes:

Name of QIR Company:	Not applicable.
QIR Individual Name:	Not applicable.
Description of services provided by QIR:	Not applicable.

Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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If Yes:

Name of service provider:	Description of services provided:
Not applicable.	

Note: Requirement 12.8 applies to all entities in this list.



Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** – The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as “Not Tested” or “Not Applicable” in the ROC.
- **Partial** – One or more sub-requirements of that requirement were marked as “Not Tested” or “Not Applicable” in the ROC.
- **None** – All sub-requirements of that requirement were marked as “Not Tested” and/or “Not Applicable” in the ROC.

For all requirements identified as either “Partial” or “None,” provide details in the “Justification for Approach” column, including:

- Details of specific sub-requirements that were marked as either “Not Tested” and/or “Not Applicable” in the ROC
- Reason why sub-requirement(s) were not tested or not applicable

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed:		Hosting and managed services		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.1.3 - US Signal does not store, process or transmit cardholder data. Cardholder data flow diagrams are not applicable. 1.2.2 - US Signal does not have any in-scope routers. 1.3.6 - US Signal is a colocation and managed service provider that does not have access to cardholder data and does not store, process or transmit cardholder data.
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1 - US Signal does not store, process or transmit cardholder data. Cardholder data is not transmitted over wireless networks. 2.6 - US Signal is not a shared hosting provider.
Requirement 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.x - US Signal is a colocation and managed service provider that does not have access to cardholder data and does not store cardholder data.
Requirement 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	4.x - US Signal offers hosting and managed services to its customers, which customers may use to store, process or transmit CHD. US Signal's customers are responsible for the security of the CHD they store, process, or transmit.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.3.x - US Signal does not perform application/software development. 6.4 to 6.4.4 - US Signal does not perform application/software development.



PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
				6.5.x - US Signal does not perform application/software development. 6.6.x - US Signal does have in-scope public-facing Web applications.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.5.1 - US Signal does not have remote access to customer premises. 8.7.x - US Signal does not store cardholder data.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.5, 9.5.1, 9.6, 9.6.1, 9.6.2, 9.6.3, 9.7, 9.7.1, 9.8, 9.8.1, 9.8.2 - US Signal does not store, process or transmit cardholder data. US Signal does not media that contains cardholder data 9.9.x - US Signal does not use POI devices.
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10.2.1 - US Signal is a colocation and managed service provider that does not have access to cardholder data and does not store cardholder data.
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 12:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12.8.1, 12.8.2, and 12.8.4 – US Signal does not use third-party service providers and vendors with regard to its PCI DSS requirements.
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A1 - US Signal is not a shared hosting provider.
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A2 - No SSL or Early TLS is in use.



Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

The assessment documented in this attestation and in the ROC was completed on:	July 30, 2023
Have compensating controls been used to meet any requirement in the ROC?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated July 30, 2023.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (**check one**):

<input checked="" type="checkbox"/>	Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby US Signal Company, LLC has demonstrated full compliance with the PCI DSS.						
<input type="checkbox"/>	Non-Compliant: Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby (Service Provider Company Name) has not demonstrated full compliance with the PCI DSS. Target Date for Compliance: An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. <i>Check with the payment brand(s) before completing Part 4.</i>						
<input type="checkbox"/>	Compliant but with Legal exception: One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand. <i>If checked, complete the following:</i>						
	<table border="1"> <thead> <tr> <th>Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects.
<input type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.



Part 3a. Acknowledgement of Status (continued)

<input checked="" type="checkbox"/>	No evidence of full track data ¹ , CAV2, CVC2, CVN2, CVV2, or CID data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor (Coalfire and MegaplanIT).

Part 3b. Service Provider Attestation

DocuSigned by:

ED1779A92BD84F1...

Signature of Service Provider Executive Officer ↑	Date: 8/1/2023
Service Provider Executive Officer Name: Trevor Bidle	Title: Chief Information Security Officer

Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)

If a QSA was involved or assisted with this assessment, describe the role performed:

The QSA and PCI team performed interviews, observations and testing for in-scope requirements of the Data Security Standard remotely. As a result of hybrid working environments, work was performed offsite via teleconferencing and Web-based meetings.

DocuSigned by:

1D0CADC8B6AE45B...

Signature of Duly Authorized Officer of QSA Company ↑	Date: 8/1/2023
Duly Authorized Officer Name: Mr. Greg Schu	QSA Company: BDO USA

Part 3d. Internal Security Assessor (ISA) Involvement (if applicable)

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed:

¹ Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

² The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

³ Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.



Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement. If you answer “No” to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

PCI DSS Requirement	Description of Requirement	Compliant to PCI DSS Requirements (Select One)		Remediation Date and Actions (If “NO” selected for any Requirement)
		YES	NO	
1	Install and maintain a firewall configuration to protect cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
2	Do not use vendor-supplied defaults for system passwords and other security parameters	<input type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
4	Encrypt transmission of cardholder data across open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems against malware and regularly update anti-virus software or programs	<input type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and applications	<input type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	
8	Identify and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
10	Track and monitor all access to network resources and cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
11	Regularly test security systems and processes	<input type="checkbox"/>	<input type="checkbox"/>	
12	Maintain a policy that addresses information security for all personnel	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Shared Hosting Providers	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	

