



March 4, 2008
Via ECFS Transmission

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

RE: **Global Tel*Link Corporation - 2007 CPNI Certification Filing**
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of Global Tel*Link Corporation, as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to morton@tminc.com.

Sincerely,

Robin Norton
Consultant to Global Tel*Link Corporation

RN/ks

cc: Best Copy and Printing - FCC@BCPIWEB.COM
FCC Enforcement Bureau (provided via ECFS website)
Dorothy Cukier - Global Tel*Link
file: Global Tel*Link - FCC
tms: FCCx0801

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: **2007**

Name of company covered by this certification: **Global Tel*Link Corporation**

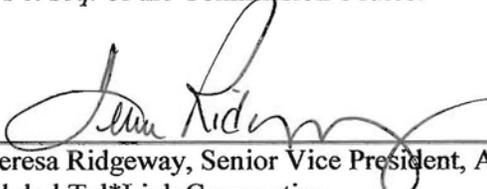
Form 499 Filer ID: **809240**

Name of signatory: **Teresa Ridgeway**

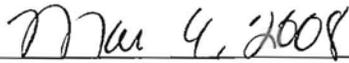
Title of signatory: **Senior Vice President, Administration**

I, **Teresa Ridgeway**, certify and state that:

1. I am the **Senior Vice President of Global Tel*Link Corporation** and, acting as an agent of the company, I have personal knowledge of **Global Tel*Link Corporation's** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Global Tel*Link Corporation 's** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. 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.



Teresa Ridgeway, Senior Vice President, Administration
Global Tel*Link Corporation



Date

**Statement of CPNI Procedures and Compliance
For 2007
Global Tel*Link Corporation**

Global Tel*Link Corporation operates solely as an inmate service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship. We do not have any information that relates to the quantity, technical configuration, type, or location of the customer's presubscribed services. Because our service is provided outside of any presubscribed service relationship, we do not obtain any CPNI that can be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

As set forth below, we have processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail.

We do not provide call detail information over the telephone. We do not offer on-line access to CPNI. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the call and we can verify it against our records. Customer service personnel must learn our company privacy policy thoroughly, including the consequences for violation, which include warnings up to employee termination.

All our accounts are kept anonymous. For direct billed or prepaid accounts, customers may, at their option, set up a pass code for use during billing inquiries. If a pass code is lost or forgotten, we have a back-up authentication method that does not involve the use of readily available biographical information. The customer must answer questions that only he or she would know. Otherwise the customer must provide a new pass code via fax or else requests for call detail are provided only by calling the customer back at the telephone number of record. We do not initiate changes to customer account information.

Our automated IVR allows end users to access their account balance by providing their destination telephone account number (or pass code, if the customer has elected to use that option.) Call detail information is not provided through our automated IVR.

We have had no occasions where CPNI was disclosed to third parties, however we have procedures in place to maintain records of any such disclosures. Any requests for call detail by outside parties are referred to designated management personnel at the correctional facilities who, by virtue of their ownership, and whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should we ever be required provide call records ourselves, we would do so only subject to subpoena, and records will be kept in accordance with the applicable rules.

As an inmate services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2007, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

Due to the nature of the inmate calling services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.