VALUE-ADDED COMMUNICATIONS

January 20, 2009

VIA ELECTRONIC DELIVERY

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

Re: EB-06-36
CC Docket No. 96-115 and WC Docket No. 04-36
Certification of CPNI Filing February 29, 2008

Dear Secretary Dortch,

Pursuant to the Commission's Public Notice released on January 29, 2008, attached is the annual certification of Value-Added Communications, Inc. in compliance with section 64.2009(e) of the Commission's amended rules, 47 C.F.R. §64.2009(e).

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Tad Summerfield

VALUE-ADDED COMMUNICATIONS, INC.
ANNUAL SECTION 64.2009(e) CERTIFICATION

I, Tad Summerfield, a duly authorized officer of Value-Added Communications, Inc. ("VACI"), Form 499 Filer ID: 817348, hereby certify on behalf of VACI, that I have personal knowledge that the Company has operating procedures as described in the attached statement that to the best of my knowledge, information and belief are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. Subpart U, implementing Section 222 of the Communications Act of 1934, as amended.

Tad Summerfield
President - Services
Value-Added Communications, Inc.
January 20, 2009

STATEMENT REGARDING OPERATING PROCEDURES IMPLEMENTING 47 C.F.R. SUBPART U GOVERNING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains the internal procedures of Value-Added Communications, Inc. ("VACI") to ensure that it is in compliance with the Commission's CPNI rules.

VACI provides telecommunications services to inmates in local, state, and federal prison facilities. As part of those inmate services, VACI may provide interstate and/or international long distance services, as well as local and intraLATA toll services. VACI only provides these services to inmates via contractual arrangements with the various prison administrations (Subcontracts), such as police departments, Sheriff's departments, state Departments of Correction (DOC), and the Federal Bureau of Prisons (FBOP).

A large part of VACI's business is made up of its Subcontract with the FBOP. Under the FBOP Subcontract and a number of other VACI correctional contracts, the customer data is the property of the government agency administering the prisons. Thus, VACI is not permitted to access this information for marketing purposes and, in fact, follows several protocols to protect such information on behalf of the correctional facility. As part of the FBOP Subcontract, VACI must comply with certain security standards for customer data applicable to government contractors, such as the following:

- *National Institute of Standards and Technology* – NIST Special Publication 800-53 Information Security
- *Federal Information Technology Security Policy* – OMB Circular A-130 management of Federal Information Resources
- *Department of Justice Program (DOJ) Management Policy* – DOJ 2640.2D Information Technology Security

Because a large part of VACI's business is made up of its Subcontract with FBOP, the processes, procedures, and physical hardware to comply with the above government security standards are also used in connection with VACI's protection and handling of customer data. Some key aspects of VACI's customer data security are:

- *Need to Know* – VACI only allows employee access to customer information on a need-to-know basis. All of VACI's employees who deal with FBOP 'customer' data must take and pass a federal background check as administered through the Department of Justice.
- *Physical Security* – VACI maintains a single physically secure facility for the storage of all customer data. Customer data is also maintained for

each prison facility inside the prison itself, each prison having its own but effective physical security.

- *Computer Security* – VACI maintains a secure data infrastructure accessible by authorized personnel only.
- *Network Security* – VACI maintains a NIST compliant data network infrastructure.
- *No Marketing* - VACI does not use any of the 'customer' data for any marketing or sales purposes. While most of the 'customer' data is not owned or handled by VACI, what little 'customer' data VACI does handle is not, and is not planned to be, used for any marketing or sales purpose.

VACI's operating procedures are designed to ensure consumer information is protected in compliance with section 222 of the Communications Act. Further, in light of VACI's status as a government contractor, the Company also institutes a number of strict information security measures designed to comply with the aforementioned government imposed standards and provide a high level of security for customer data.

VACI uses CPNI internally for the purpose of providing telecommunications services. VACI also uses CPNI internally for the following actions:

(1) to bill and collect for services rendered;

(2) to protect the rights or property of VACI, or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, VACI's services.

(3) to provide investigative data for the prison governmental administration in their investigative and security responsibilities over the inmates and prisons in question.

VACI procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted by statute or Commission rule.

VACI employees are trained to secure CPNI and related confidential information. VACI does not sell, disclose or otherwise distribute CPNI to third parties outside of its own activities. All customer "End-User" accounts are password protected and information is not released or accessed until the customer confirms their identity. Call detail is not accessibly by phone or online even with password confirmation.

VACI does not implement any externally requested changes to the customers account without the customer requesting the change by either

electronic mail or phone call. Changes are implemented only after customer confirms their identity.

VACI has procedures in place to notify law enforcement and customers within seven (7) days of any breach of CPNI. Records will be maintained with detailed information of the breach and notification process.

VACI has not had to take action against any pretexter/data brokers in the past year. VACI has procedures in place and will report any information that they have with respect to the processes that are being used to access CPNI.

VACI did not receive any complaints regarding the unauthorized release of CPNI for January 01, 2008 through December 31, 2008.