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February 27, 2009
Via ECFS

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

**RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2008
AGM Telecom Corporation - Form 499 Filer ID 825460**

Dear Ms. Dortch:

Enclosed for filing is the 2008 CPNI Compliance Certification submitted on behalf of AGM Telecom Corporation. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 09-9 issued January 7, 2009.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to mbyrnes@tminc.com.

Sincerely,

Monique Byrnes
Consultant to
AGM Telecom Corporation

Attachments

MB/sp

cc: FCC Enforcement Bureau (2 copies)
Best Copy and Printing (via email to FCC@BCPIWEB.COM)
T. Joe - AGM
file: AGM - FCC
tms: FCCx0901

Annual 64.2009(e) CPNI Certification for: Calendar Year 2008
Date Filed: February 27, 2009
Name of Company covered by this certification: AGM Telecom Corporation
Form 499 Filer ID: 825460
Name of Signatory: Tommie Joe
Title of Signatory: President & Chief Operating Officer

I, Tommie Joe, certify and state that:

1. I am the President and Chief Operating Officer of AGM Telecom Corporation and, acting as an agent of the company, 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. Section 64.2001 et seq.*
2. 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.
3. The company has not taken any actions against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Tommie Joe, President & Chief Operating Officer
Public Communications Services, Inc.

2/27/09

Date

Attachment A
Statement of CPNI Procedures and Compliance

AGM Telecom Corporation

Calendar Year 2008

AGM Telecom Corporation

Statement of CPNI Procedures and Compliance

AGM Telecom Corporation, ("AGM" or "Company") operates solely as a provider of inmate operator services and as such provides only automated operator assisted call completion services to inmates of local, state and federal confinement institutions. The Company provides service via contractual arrangements resulting from responses to public bids from confinement institutions.

AGM does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If the Company elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company does not bill customers directly. Instead, the Company provides rated call records to billing companies and billed calls appear on the customer's local exchange company bill or are debited from a prepaid account. To the extent that the billing companies act as agents for the Company and provide call detail information to customers over the telephone, such disclosure would most likely fall within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer service issue.

If a customer is not able to provide the call detail information to qualify for the exception the Company has been advised by its billing companies that the billing companies will either call the customer back at the telephone number of record, mail the information to the customer's address of record or request the customer call back with the call detail before providing further assistance.

In lieu of contacting the Company's billing companies, Customers may contact AGM directly to review or discuss the AGM portion of the LEC bill or the prepaid account.

AGM Telecom Corporation

Statement of CPNI Procedures and Compliance (Page 2)

All of the AGM Customer Care Representatives are trained on how and when they are allowed to release call detail information. Representatives are informed that they are not to release call detail information, unless the customer can provide the call detail necessary to address their customer service issue, without first authenticating the customer via a pre-established PIN or calling back to the account phone number on record under any circumstance. This callback can be made by a live customer care representative or by AGM's automated authentication and PIN set-up system. The customer then provides AGM with a 4-digit numeric PIN of their choosing. AGM advises the customer that to maximize security, they should not choose a PIN based upon easily obtained biographical or account information. AGM informs customers, after the PIN set-up is complete, that this PIN needs to be provided by the customer before they are allowed to obtain access to any CPNI data via the live Customer Care Department. If a customer is unable to provide the correct PIN the customer must be re-authenticated via the process outlined above.

AGM Customer Representatives are instructed not to release any CPNI data over the phone without first authenticating the customer, either via a previously established PIN or the call back method. The AGM Customer Care computer application maintains a log of all actions taken by a Customer Care Representative when handling a specific call. Whether the caller provided their correct PIN, whether a call back authentication was necessary, whether the caller was setting up a brand new account and set up a new PIN, is all captured in this log. This log is reviewed by the supervisors of the Customer Care Department. All calls are also subject to monitoring by the Customer Care Department supervisors.

In addition to the Customer Care Representatives, all AGM employees who have access to CPNI are trained annually on the importance of protecting customer data and security. Training includes information on and policies on when and how CPNI data can be released and also covers the new technological and procedural advancements that AGM has enacted to ensure that all employees are up to date with all policies.

AGM Telecom Corporation

Statement of CPNI Procedures and Compliance
(Page 3)

All AGM employees are required to sign a Confidentiality Agreement upon hire, which explicitly states that they are not allowed to divulge any proprietary customer data which they may encounter performing their job, including CPNI, during or after their tenure with AGM. There is a documented company policy guide that outlines the disciplinary procedures should an employee breach this agreement. Resulting disciplinary actions due to breach of the Confidentiality Agreement are handled on a case by case basis, based on the severity of the breach, up to and including immediate termination.

The Company does not offer on-line access to CPNI.

The Company does not have any retail locations and therefore does not disclose CPNI at in-store locations.

Requests for call detail records by law enforcement agencies are only granted if a subpoena is provided.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or call records in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call records.