February 9, 2012
Via ECFS Filing

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

RE: Infinity Networks, Inc.
CY2011 Annual CPNI Certification Filing
EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for filing please find the Annual CPNI Compliance Certification for calendar year 2011 submitted on behalf of Infinity Networks, Inc., as required by section 64.2009(e) of the Commission's rules.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com.

Thank you for your assistance in this matter.

Sincerely,

Robin Norton
Consultant to Infinity Networks, Inc.

cc: Johnny Hemphill - Infinity Networks, Inc. (via email)
cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
file: Infinity Networks, Inc. - FCC
tms: FCCx1201

Enclosures
RN/lm

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 2012:	Covering calendar year 2011
Name of company(s) covered by this certification:	Infinity Networks, Inc.
Form 499 Filer ID:	824562
Name of signatory:	Mo Mascorro
Title of signatory:	President

1. I, Mo Mascorro, 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*.

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 (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq*. of the Commission's rules.

3. 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 in the past year.

4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

5. 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.

M. Mascorro

Mo Mascorro, President
Infinity Networks, Inc

2/8/12

Date

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance
For 2011
Infinity Networks, Inc.

Infinity Networks, Inc. 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.

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.

We do not provide call detail information over the telephone at all. All customer service personnel are trained not to discuss call detail information unless the date and time of the call on the phone bill matches our billing records. For collect calls, the called party's local phone company is responsible for rendering the charges on the individual customer's bills, and handles customer inquiries concerning call detail (usually billed charges) in accordance with its own established procedures.

For called parties who establish a prepaid account, we attempt to obtain customer name, address, inmate name, correctional facility of incarceration and phone number to be called. We do not validate this information for accuracy in any way and it is stored in an encrypted form within a SQL Database. Only two employees have access to this data. We gather this information in order to issue refunds to the prepaid account holders after the inmate is released or is transferred to a different facility. The Sheriff's department staff members also require this information for investigation purposes.

Regarding customer inquiries concerning prepaid accounts, if a customer cannot provide the required call detail information to customer service representatives over the phone, we will provide requested information only by mail, and only if the customers sends a self-addressed stamped envelope to our address. The address on the envelope is verified against the address give during the prepaid account set up process. If they do not match, call detail is not provided. We will only provide a brief statement indicating that we are not authorized to release this information because account holder information could not be verified.

The two employees who have authority to access customer information are also responsible for maintaining and updating our employee manual that specifies the above referenced procedures.

Any requests for raw call records are referred to designated management personnel at the correctional facilities who, by contract, own the call records, 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.

We do not disclose call detail on line to end users under any circumstances. Call detail is required to be made available to correctional facility management personnel 24/7, and they control access to it on a standalone call processor within the correctional facility. Remote access to this equipment is via direct dialup connection (internet access is not implemented or authorized) and is secured through three levels of password protection. The correctional facility management personnel have their own log in and password procedures, and control access to this information on their end. We are not involved in that process in any way.

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

We have processes in place to safeguard the inmate-originated 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 these records.

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 2011, 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 2011.

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.