February 13, 2012
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: Inmate Calling Solutions, LLC d/b/a ICSolutions
CY2011 Annual CPNI Certification Filing
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009(e) submitted on behalf of the Inmate Calling Solutions, LLC d/b/a ICSolutions.

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

Robin Norton
Consultant to Inmate Calling Solutions, LLC

cc: Kenneth Dawson – ICS (via email)
cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
file: ICS - 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:	Inmate Calling Solutions, LLC d/b/a ICSolutions
Form 499 Filer ID:	824136
Name of signatory:	John Goetsch
Title of signatory:	Vice President Technology

1. I, John Goetsch, 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.

John Goetsch, Vice President Technology
Inmate Calling Solutions, LLC d/b/a ICSolutions

February 9, 2012
Date

Attachment A

Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance
For 2011
Inmate Calling Solutions, LLC d/b/a ICSolutions

Inmate Calling Solutions, LLC ("ICS") operates primarily as an inmate telephone service provider and, as such, provides only automated-operator assisted call completion services for transient end users. Therefore, all of its telephone services consist of casual traffic provided without any presubscribed service relationship. ICS does not have any information that relates to the quantity, technical configuration, type, or location of the consumer's subscribed telecommunication services. Moreover, ICS does not, in the ordinary course, obtain any CPNI that could be used for marketing purposes. Calls are either billed by the consumer's local exchange carrier or provided on a prepaid basis.

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

ICS has 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. ICS does not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the subject call and they can verify same against ICS' records. For collect calls, the called party's local phone company bills the call charges on ICS' behalf and has its own controls for disclosure and access to applicable information.

For called parties who establish a prepaid account, ICS typically obtains customer name, address, and phone number in order to establish the account. However, since its telephone services are based on contractual relationships directly or indirectly with correctional facilities, ICS does not market any telephone services directly to consumers and, therefore, any information that could be deemed CPNI is only used for account administration purposes.

ICS' contracts with correctional facilities generally provide that call detail is the sole property of the correctional facility and that ICS must only disclose or allow access to this data by a) authorized correctional facility personnel, b) the paying party for billing purposes, or c) applicable ICS personnel for technical and billing support purposes. Correctional Facility and ICS personnel must have a valid user ID and password in order to access this data at any time. Such personnel are assigned User IDs and passwords to enable controlled access to call detail records and recordings for inmate calls placed from the facility with which they are associated. This access is handled on-site only by an authorized facility administrator. The administrator at each location will also establish and manage the process for any lost password replacement. The system provides for a password expiration which forces users to modify their password on a regular basis for added security. Passwords are not assigned based on readily-available biographical information.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities who are themselves representatives of state and/or local law enforcement and, therefore, operate under applicable jurisdictional policies. Direct third party requests for call record detail must be made subject to a subpoena or other court sanctioned process.

As an inmate telephone service provider, ICS does not have any retail locations and therefore does not disclose CPNI on any "in-store" basis.

ICS has procedures in place to notify law enforcement in the event of a breach of the call detail records. Since ICS' customers are law enforcement entities, ICS defers to such entities for any escalation to federal agencies. ICS has not experienced any such breaches during 2011, but has a process in place to maintain records of any such breaches if/when discovered.

ICS has not taken any actions against data brokers in the past year.

ICS 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 service business, the underlying call detail is not tied to any presubscribed customers. Accordingly, ICS has not developed any information with respect to the processes that pretexters may use to attempt to access CPNI.