February 17, 2012
Via ECFS Filing

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

RE: Value-Added Communications, Inc.
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 Value-Added Communications, Inc.

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 Value-Added Communications, Inc.

cc: Brian Hackett – VAC (via email)
file: VAC - 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:	Value-Added Communications, Inc.
Form 499 Filer ID:	817348
Name of signatory:	Teresa Ridgeway
Title of signatory:	Senior Vice President Administration

1. I, Teresa Ridgeway, 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.

Teresa Ridgeway, Senior Vice President Administration
Value-Added Communications, Inc.

Feb 15, 2012
Date

Attachment A
Statement of CPNI Procedures and Compliance

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 2640.20 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 customer's 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, 2011 through December 31, 2011.