



February 23, 2012  
Via ECFS Filing

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

RE: Dollar Phone Corp.  
EB Docket No. 06-36; 2011

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 Dollar Phone Corp. The Company respectfully requests an effective date for this filing of February 23, 2012.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas  
Sharon Thomas  
Consultant to Dollar Phone Corp.

cc: Eitan Kimelman  
file: DPC - FCC - Other  
tms: FCx1201

Enclosures  
ST/im



**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Dollar Phone Corp.**

### **Statement of CPNI Procedures and Compliance**

Dollar Phone Corp. ("Dollar Phone" or "Company") provides wholesale telecommunications services to other carriers and as such does not have any subscribed service relationship with any business or residential customers. The Company does not obtain, retain or use CPNI for marketing or any other purpose. Although the Company does have call detail records, it does not have any information regarding the calling or called party, and such information is not used for any marketing purposes. Dollar Phone is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company provides for disciplinary action for such violations, up to and including termination of employment.

As a wholesale service provider, Dollar Phone does not market its services to end users. Any marketing efforts would be directed towards other carriers and would not involve the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should Dollar Phone 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 that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

To the extent the Company provides services in the future that involves CPNI or call detail records, the Company will ensure that it establishes procedures to notify law enforcement in the event of a breach of such CPNI, including call detail records, to ensure that notification is provided in the time period set

forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company would institute a process to record all breaches discovered and to provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company did not have any breaches during 2011.

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

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2011.

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