



February 28, 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: West IP Communications, Inc. d/b/a Smoothstone IP Communications – 499 Filer ID 826161  
CY 2011 Annual CPNI Certification  
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 West IP Communications, Inc. d/b/a Smoothstone IP Communications.

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

Sincerely,

/s/ Sharon Thomas

Sharon Thomas  
Consultant to West IP Communications, Inc.  
d/b/a Smoothstone IP Communications

cc: Lynn Stang - West IP (via email)  
file: West IP - FCC - CPNI  
tms: FCx1201

Enclosures  
ST/sp

**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 covering the prior calendar year 2011

Name of company covered by this certification: West IP Communications, Inc. d/b/a Smoothstone IP Communications (f/k/a Smoothstone IP Communications Corporation)

Form 499 Filer ID: 826161

Name of signatory: Jeff Wellemeyer

Title of signatory: Executive Vice President

I, Jeff Wellemeyer, 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.*

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.

The company has not taken any 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) against data brokers in the past year.

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

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.

Signed: \_\_\_\_\_

Jeff Wellemeyer  
Executive Vice President  
West IP Communications, Inc.

Date: \_\_\_\_\_

2/23/12

West IP Communications, Inc.  
d/b/a Smoothstone IP Communications  
f/k/a Smoothstone IP Communications Corporation ("Smoothstone")

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

Accompanying Statement to Annual Certification

Smoothstone does business only with Enterprise clients and does not provide any consumer telephone services of any kind. West IP has not used CPNI except as included in 47 U.S.C. 222(d) exceptions.

- a) Smoothstone has not sought customer approval of the use of CPNI since CPNI is not used.
- b) Smoothstone has a strict unconditional, non-disclosure policy with respect to any customer proprietary network or telecommunications related information. That strict non-disclosure policy is specifically communicated to all employees through individual confidentiality agreements.
- c) Smoothstone has not used CPNI in any sales or marketing campaign.
- d) Smoothstone has no outbound sales or marketing campaigns to existing customers. If such campaigns were initiated in the future, no outbound sales or marketing campaigns can be conducted without management approval and any such campaign would require supervisory review to assure compliance with the CPNI rules.