February 28, 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: International Communication Services, Inc. – 499 Filer ID 826847
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 International Communication Services, Inc.

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 International Communication Services, Inc.

cc: Ana Gutierrez - Intl Comm Svcs
file: Intl Comm Svcs - 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 for:	Calendar Year 2011
Name of Company covered by this certification:	**International Communication Services, Inc.**
Form 499 Filer ID:	826847
Name of Signatory:	Angharad Jassad
Title of Signatory:	Treasurer

I, Angharad Jassad, certify and state that:

1. I am Treasurer of International Communication Services, Inc., 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 as Attachment A 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 Section 64.2001 *et seq.* of the Commission's rules.

3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The company has not received any 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.

Angharad Jassad, Treasurer
International Communication Services, Inc.

February 20th, 2012
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A
Statement of CPNI Procedures and Compliance

International Communication Services, Inc.

Calendar Year 2011

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

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International Communication Services, Inc.

Statement of CPNI Procedures and Compliance

International Communication Services, Inc. ("ICS" or "Company") operates solely as a provider of long distance prepaid debit card services sold via the internet or in retail stores not owned or operated by the Company. For retail services, the Company does not have any subscribed relationship with its customers and does not have any identifying information regarding its customers. Web-based sales do provide the Company an opportunity to build a subscribed relationship with its customers..

ICS does not use or permit access to CPNI for marketing purposes. ICS' marketing efforts are mass advertising, including internet advertising, and point of sale, and 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 that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company however does maintain prepaid debit call detail records. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and has in place methods to discover and protect against attempts by third parties to gain unauthorized access to this information. Call detail is not available and therefore is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

Customers who purchase prepaid service via the internet are requested to establish a password on-line. Account information, including call detail, is available to customers of on-line service. In the event a customer loses or forgets the password established, the company has an authentication procedures to allow the customer to set up a new password. Information is only provided to customers via the email address established when service was initiated.

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made to the extent the Company has such information, to customers.

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

ICS did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2011.

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