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February 28, 2013

Overnight Delivery

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20054

Re: Annual CPNI Certification of Trinity Communications Ltd.
EB Docket 06-36

Dear Ms. Dortch:

On behalf of Trinity Communications Ltd., and pursuant to Enforcement Advisory No. 2013-02, released January 16, 2013, DA 13-71, enclosed please find an original and four (4) copies of the company's annual CPNI certification for calendar year 2012. Should any questions arise concerning this submission, please contact the undersigned counsel directly.

Sincerely,



Eric Fishman
Counsel to Trinity Communications Ltd.

Enclosures

0+4

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

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2012

1. Date filed: March 1, 2013
2. Name of company(s) covered by this certification: Trinity Communications Ltd.
3. Form 499 Filer ID: N/A (Company does not provide interstate telecommunications or interstate telecommunications service)
4. Name of signatory: Anthony Butler
5. Title of signatory: President and CEO
6. Certification:

I, Anthony Butler, 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 (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.

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) against data brokers in the past year.

The company has not received 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 

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (if applicable)
 Summary of customer complaints (if applicable)

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Customer Proprietary Network Information

Purpose

The purpose of these procedures is to protect the confidentiality of proprietary information of carriers, vendors and customers.

Scope

These procedures apply to all personnel of Trinity Communications Ltd., including all permanent and temporary employees, their subsidiaries, affiliates, and members of their Board of Directors, as well as their consultants, advisors, and contractors.

Definitions

Customer Proprietary Network Inform ("CPNI") means:

(a) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer or a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and

(b) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier.

Trinity Communications Service includes one category of service:

(a) Broadband transport over fiber optic cable, and/or

(b) Internet access over fiber optic cable.

Procedures

(a) CPNI may be released to contractors and/or vendors to provision TRINITY COMMUNICATIONS Service ordered by the customer or to install inside wire, maintain or repair TRINITY COMMUNICATIONS Service.

(b) CPNI will not be used for the purpose of marketing services, other than by affiliates of TRINITY COMMUNICATIONS when marketing TRINITY COMMUNICATIONS Service to a TRINITY COMMUNICATIONS customer. TRINITY COMMUNICATIONS will not use CPNI in any sales or marketing campaign. The President of TRINITY COMMUNICATIONS shall review all outbound marketing campaigns prior to implementation to insure compliance with these procedures.

(c) The TRINITY COMMUNICATIONS web site will not be used to collect personally identifying information. In particular, the web site will not be used to:

- Track, collect or record any information that can be used to identify an individual visitor at the TRINITY COMMUNICATIONS web site.
- Attempt to create marketing or email address lists from the email we receive.
- Participate in any data mining activities with other vendors.

TRINITY COMMUNICATIONS will not release any personally identifiable information to third parties for any reason. Additional information is included in the company's Acceptable Usage Policy that is included in our Customer Service Agreement.

Destruction of CPNI

Company records including CPNI shall be destroyed when no longer required. Paper records must be shredded. Electronic media shall be given to the Director, Network Operations for destruction.

Compliance

The issue of Confidentiality of information shall be discussed by supervisors with their direct reports and reinforced during periodic company-wide staff meetings. Employees must include "CONFIDENTIAL" on all documents that include CPNI.

It is the responsibility of all employees to comply with these procedures. Any deviation from this policy and its procedures may result in disciplinary action, up to and including termination of employment.

Advice and Counsel

The President of TRINITY COMMUNICATIONS shall provide advice and counsel regarding these procedures.

Reference

These procedures are required under Section 222 of the Communications Act of 1934 and Sections 64.2005 to 64.2009 of the Federal Communications Commission's rules.