



February 5, 2014  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**RE: G-Five Communications LLC**  
Annual CPNI Certification Filing - CY2013  
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 Annual CPNI Certification and Statement of Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the G-Five Communications LLC.

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](mailto:rnorton@tminc.com).

Sincerely,

/s/Robin Norton

Robin Norton  
Consultant to G-Five Communications LLC

cc: Karen McBee - G-Five Communications  
file: G-Five Communications - FCC  
tms: FCCx1401

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 2014:           Covering calendar year 2013  
Name of company(s) covered by this certification:       G-Five Communications LLC  
Form 499 Filer ID:                                               828683  
Name of signatory:                                               Ronald McPherson  
Title of signatory:                                               Chief Executive Officer

1.     I, Ronald McPherson, 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.



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Ronald McPherson, Chief Executive Officer  
G-Five Communications LLC

2-4-14

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Date

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

**Statement of CPNI Procedures and Compliance  
For 2013  
G-Five Communications LLC**

G-Five Communications LLC is a local and long distance service reseller providing telecommunications and non-telecommunications services for use by payphone providers. We do not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our marketing efforts do not require the use of any client-specific information. Should we elect to use CPNI in any future marketing efforts, we 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.

We have instituted authentication procedures to safeguard the disclosure of call detail over the telephone. Our authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC. If a customer cannot provide the correct password then the customer must provide the call detail information that is the subject of the inquiry without any assistance. Any additional information will be provided only by mail to the address of record or via phone to the number of record.

Similarly, we have instituted authentication procedures to safeguard the disclosure of CPNI on-line. . We authenticate customers by providing unique access codes and passwords that are required in order for clients to obtain their call detail data online. The passwords do not involve readily available biographical information or account information. Unless the appropriate password is provided, we do not allow on-line access to the client's data. If there is any suspicion by either the company or the customer that a password may have been compromised, a new one is issued immediately.

We have procedures in place to notify customers whenever a password, authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information. We do not send the notification to the new account information. We notify clients only via mail to the customers' billing address on file.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2013.

We have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.