February 21, 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: Global Tel*Link Corporation**
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 Global Tel*Link Corporation.

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. Thank you for your assistance in this matter.

Sincerely,

/s/ Robin Norton

Robin Norton
Consultant to Global Tel*Link Corporation

cc: Brian Hackett (Via Email) - Global Tel*Link
file: Global Tel*Link - 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: | Global Tel*Link Corporation |
| Form 499 Filer ID: | 809240 |
| Name of signatory: | Teresa Ridgeway |
| Title of signatory: | Secretary and Senior Vice President Administration |

1. I, Teresa Ridgeway, 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.

Teresa Ridgeway
Secretary and Senior Vice President Administration
Global Tel*Link Corporation

Feb 11, 2014
Date

# Attachment A

## Statement of CPNI Procedures and Compliance

**Statement of CPNI Procedures and Compliance**
**For CY2013**
**Global Tel*Link Corporation**

Global Tel*Link Corporation operates as an inmate service provider and public payphone provider and as such, provides only operator-assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship. We do not have any information that relates to the quantity, technical configuration, type, or location of the customer's presubscribed services. Because our service is provided outside of any presubscribed service relationship, we do not obtain any CPNI that can be used for marketing purposes

Our marketing efforts are directed only toward correctional facilities and public payphone spaces, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, 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, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

As set forth below, we have processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail.

We do provide call detail information over the telephone. However, there are safeguards in place to protect against disclosure to unauthorized persons. We do not offer on-line access to CPNI. All customer service personnel are trained not to discuss call detail information unless the caller provides the appropriate password or date and time of the call in question, and we can verify it against our records. Customer service personnel must learn our company privacy policy and CPNI policy thoroughly, including the spectrum of consequences for violation, which spans from the issuance of a verbal warning up to the exercise of employee termination.

All of our accounts are kept anonymous. Customers must set up a pass code for use during billing inquiries. If a pass code is lost or forgotten, we have a back-up authentication method that does not involve the use of readily available biographical information. The customer must answer questions that only he or she would know. Otherwise the customer must provide a new pass code via fax or else requests for call detail are provided only by calling the customer back at the telephone number of record. We do not initiate changes to customer account information.

Our automated IVR allows end users to access only their account balance by providing their destination telephone account number (or pass code, if the customer has elected to use that option.) Call detail information is not provided through our automated IVR.

We have had no occasions where CPNI was disclosed to third parties, and we do have procedures in place to maintain records of any such disclosures. Any requests for call detail by outside parties must be accompanied by a court-ordered subpoena or search warrant, or clearance from the correctional facility that owns the records.

GTL has no retail locations and therefore does not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a confirmed breach of the call detail records. We have not had any such breaches during 2013, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

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

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

Due to the nature of the specialized services GTL provides, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.