

Catherine Wang  
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December 4, 2007

**Via FedEx**

Ms. Sharla Dillon, Docket Room Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505  
Email: sharla.dillon@state.tn.us

**Re: Docket No. 07-00262; Petition of Primus Telecommunications, Inc. and Least Cost Routing, Inc. for Approval of an Internal Reorganization**

Dear Ms. Dillon:

Primus Telecommunications, Inc. and Least Cost Routing, Inc. (collectively, "Petitioners"), through undersigned counsel, hereby respond to the Tennessee Regulatory Authority's Data Request No. 1, dated November 29, 2007.

**1. Have the petitioners filed similar petitions or notices in other states? If so, provide a listing of states and action taken.**

Yes, Petitioners have requested approval for the transaction from the following states: California, Colorado, Florida, Georgia, Minnesota, Mississippi, Missouri, New York, and Pennsylvania. All of these requests for approval are pending. Petitioners also intend to file a request for approval in Ohio.

Petitioners have also filed or will be filing notice of the proposed transaction in the following states: Alabama, Arizona, Arkansas, Connecticut, Delaware, District of Columbia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, North Carolina, North Dakota, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Washington, West Virginia, Wisconsin, and Wyoming.

**2. Provide the number of customers that Primus Telecommunications, Inc. ("PTI") currently serves in Tennessee.**

PTI has approximately 252 customers in Tennessee.

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Washington

3. **Provide the number of customers that Least Cost Routing, Inc. ("LCR") currently serves in Tennessee.**

LCR has approximately 35 customers in Tennessee.

4. **Will all LCR customers in Tennessee be transferred to PTI?**

Yes, all of LCR's customers in Tennessee will be transferred to PTI.

5. **Concerning TRA Rule 1220-4-2-.56(d)(4), please explain how the customer notice in Exhibit B to the Petition informs transferred customers that they will receive a thirty-day written notice of any rate increase that may affect their service up to ninety days from the date of transfer.**

The Petitioners inadvertently did not include a statement in the notice that customers will receive written notice thirty days prior to any rate increase occurring within ninety days from the date of transfer. The Petitioners are willing to inform its Tennessee customers about this requirement.

6. **As required by FCC Rules in Docket No. 00-257, provide a copy of the self-certification letter filed with the FCC regarding customer transfers.**

A copy of the self-certification letter as filed with the FCC is attached hereto as Attachment A.

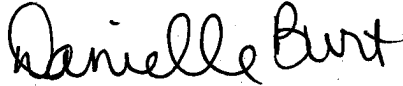
7. **Concerning the assumption of the fictitious name "Least Cost Routing" as described in the Petition, please provide information as required by TRA Rule 1220-4-4-.08.**

Petitioners seek to withdraw the request, without prejudice to file at a later date, for PTI to use a fictitious name in Tennessee. Petitioners intend to complete a registration with the Tennessee Secretary of State to use a fictitious name and will file a request with the TRA thereafter.

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An original and four (4) copies of the responses to Data Request No. 1 are enclosed as well as a diskette with an Adobe copy of the file. Please date-stamp the enclosed extra copy of this filing and return it in the self-addressed, stamped envelope provided. Should you have any questions, please do not hesitate to contact Danielle Burt at (202) 373-6039.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Danielle Burt", though the caption identifies the signatory as Catherine Wang.

Catherine Wang  
Danielle Burt

cc (via email): Carlos Black  
Jerry Kettles

**ATTACHMENT A**

**Filed FCC Self-Certification**

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November 30, 2007

**Via ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Docket No. 00-257; Notification Regarding Transfer of Customers**

Dear Ms. Dortch:

Primus Telecommunications, Inc. ("PTI"), through undersigned counsel and pursuant to Section 64.1120(e) of the Commission's rules, 47 C.F.R. §64.1120(e), hereby notifies the Commission of its intent to obtain the customer base of Least Cost Routing, Inc. ("LCR") through a *pro forma* internal reorganization.<sup>1</sup> Specifically, LCR, an interexchange carrier and affiliate of PTI, will merge with and into PTI, with PTI surviving and assuming LCR's operations.

Names of the Parties to the Transactions: The parties to the transaction include: Primus Telecommunications, Inc. and Least Cost Routing, Inc.

Types of Telecommunications Service Provided to Affected Customers: LCR provides intrastate, interstate, and international long distance services.

Date of Transfer: The parties anticipate that LCR's customers will be transferred to PTI on or before December 31, 2007, or as soon as possible thereafter following receipt of regulatory approvals.

Certification of Compliance: Attached hereto as Exhibit A is PTI's certification required under Section 64.1120(e)(1) of the Commission's rules.

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<sup>1</sup> PTI and LCR will file a separate notice letter as required by Section 63.24(f) of the Commission's rules, 47 C.F.R. §63.24(f).

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Marlene Dortch  
November 30, 2007  
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Copy of Notice Sent to Affected Subscribers: Attached hereto as Exhibit B is a copy of the customer notice that was mailed on November 21, 2007.

Should there be any questions regarding this notification, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Catherine Wang".

Catherine Wang  
Danielle Burt

cc: Kathleen Lawrence

**Exhibit A**  
**Certification**

**CERTIFICATION**

On behalf of Primus Telecommunications, Inc. ("PTI"), and in accordance with Section 64.1120 of the Commission's rules, 47 C.F.R. § 64.1120, I hereby certify under penalty of perjury that I have read the foregoing notification and the statements contained therein are true, complete and correct to the best of my knowledge. I further certify that, with respect to the transfer to PTI of the customers of Least Cost Routing, Inc. ("LCR"), PTI and LCR have complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to this streamlined process.

By: Kathleen Lawrence

Name: Kathleen Lawrence

Title: Assistant General Counsel

Date: 11-30-07



**Exhibit B**

**Customer Notice Letter**



LEAST COST ROUTING Inc.

A wholly owned subsidiary of Primus Telecommunications Group, Inc.



November 21, 2007

Dear Valued Customer:

Least Cost Routing, Inc. ("LCR"), your long distance provider, and its sister company Primus Telecommunications, Inc. ("Primus") are pleased to announce that LCR will merge with and into its affiliate Primus on or about December 31, 2007. Following the merger, you will continue to enjoy the same high quality services you currently receive from LCR and will continue to receive services with the same rates, features, terms and conditions as the service you currently enjoy. You will therefore not notice any significant change in the bills that you currently receive for long distance service or in the company's customer service procedures.

We realize you have a choice of telecommunications carriers, and we appreciate your business. Please note that if you are a customer of LCR on the date of the transfer and you have not informed LCR that you have made arrangements on your own to switch to a long-distance telephone company other than Primus, your account will automatically be transferred and your contract assigned to Primus, even if you have previously arranged for a preferred carrier freeze through your local phone company. You should not be charged any carrier-change charges levied by your local telephone company. If, however, such a charge does appear on the bill from your local telephone company as a result of this transfer, please call the customer service department toll-free at 800-226-4884 and they will reimburse you or credit your account accordingly.

We look forward to continuing to provide you with quality service for many years to come. In the meantime, if you have specific questions about this notice, please contact us at 800-226-4884.

Sincerely,

Least Cost Routing, Inc. and Primus Telecommunications, Inc.

*This notice is being sent to you because our records indicate that you are currently an active customer of Least Cost Routing, Inc. If this is not the case, please disregard this notice and contact LCR at 1-800-226-4884 so that we can update our records accordingly.*

Primus Telecommunications, Inc.  
7901 Jones Branch Drive, Suite 900 • McLean, VA • 22102 USA  
Phone: 703.902.2800 • Fax: 703.902.2814 • [www.primustel.com](http://www.primustel.com)



**Federal Communications Commission**

The FCC Acknowledges Receipt of Comments From ...

**Primus Telecommunications, Inc.**

...and Thank You for Your Comments

Your Confirmation Number is: **'20071130449757 '**

Date Received: **Nov 30 2007**

Docket: **00-257**

Number of Files Transmitted: **1**

**DISCLOSURE**

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*updated 12/11/03*