

JUL 2 2010

STi Prepaid, LLC

Missouri Public Service Commission

Company Name

(Provide the full name of the company as certificated or registered with the Missouri Public Service Commission. Do not abbreviate; include any Commission approved d/b/a or fictitious name, if applicable.)

TELECOMMUNICATIONS COMPANY OR IVoIP PROVIDER ANNUAL REPORT TO THE MISSOURI PUBLIC SERVICE COMMISSION

For the Calendar Year of January 1 - December 31, 2009

Please select how the company is certificated or registered with the Commission under the Company Name as shown above (check all that apply):

- Incumbent Local Telecommunications Company (not competitively classified ILEC)
Incumbent Local Exchange Telecommunications Company (competitively classified ILEC)
Competitive Local Exchange Telecommunications Company (CLEC)
[X] Interexchange Telecommunications Company (IXC)
Local Non-switched Telecommunications Provider (classified in EFIS as IXC)
Interconnected Voice over Internet Protocol Service Provider (IVoIP)

Please choose one of the following filing options to indicate the security level of the filing:

- [X] Public submission (NOT Proprietary or Highly Confidential)
[] Non-Public submission (Highly Confidential or Proprietary filing) (See instructions for special requirements.)

Please review the instructions document before proceeding by using the link below:



For use when filing under seal

Annual Report of STI Prepaid, LLC

for the calendar year of January 1 - December 31, 2009

1. State in full the company's information below:

<u>1250 Broadway</u>	<u>26th Floor</u>	<u>212-660-2700</u>
Company Street Address		Telephone Number
<u>3100 Cumberland Boulevard, Suite 900 Atlanta GA 30339</u>		<u>212-660-2704</u>
Company Mailing Address		Fax Number
<u>New York</u>	<u>NY</u>	<u>jenni.partridge@stiprepaid.com</u>
City	State	E-Mail Address
	<u>10001</u>	
	Zip	

2. This company is currently a (check appropriate box):

- Corporation
 Sole Proprietorship
 LP
 Partnership
 LLC
 Other - Explain

3. Annual Report Contact Information:

List the contact information of the person completing the form, whether an employee or a third-party preparer. This may differ from the address in Item No. 1.

<u>Susan Cockerham</u>		<u>770-956-7525</u>
Name		Telephone Number
<u>3100 Cumberland Blvd.</u>	<u>Suite 900</u>	<u>770-956-0700</u>
Street Address		Fax Number
<u>3100 Cumberland Blvd.</u>	<u>Suite 900</u>	<u>susan.duggan@thomsonreuters.com</u>
Mailing Address		E-mail Address
<u>Atlanta</u>	<u>GA</u>	<u>30339</u>
City	State	Zip

4. Identify the principal or general officers of the company at the end of the year. Please include an additional sheet, if enough space is not provided on this page, to completely provide the requested information.

<u>Title of General Officer</u>	<u>Name of Person Holding Office</u>
<u>President</u>	<u>Jim Continenza</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

5. Please provide a list of all mergers, consolidations, and reorganizations involving the registered or certificated company and completed during the last year. Do not include internal company reorganizations or personnel issues.

None

BMAR-2010-1742

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6. Please provide the following information concerning the company's revenues for this calendar year:

Row	Revenues:	MO Jurisdictional (Column A)	Total Company ¹ (Column B)
I. RETAIL			
1.	Local Service Revenues include tariffed revenues attributed to local telecommunications services, extended area service, secondary features such as call forwarding, caller ID, local operator services, directory-related services, etc. and for IVoIP service.		
2.	Interexchange Revenues include revenues attributed to interexchange telecommunications services such as toll services, 800 services, interexchange operator services and interexchange IVoIP services.		
3.	Non-Switched Telecommunications Service Revenues include revenues attributed to retail local and interexchange private line services (but not special access or private line services provided to other telecommunications carriers).		
4.	Bundled or Packaged Revenues include any revenues whereby the company is providing voice services in combination with multiple services whereby revenue can not be easily attributed to local, interexchange or non-switched categories. If such bundles includes Internet, video or some non-regulated service then the company's revenue shall be based on the company's rate offer for solely voice services. The excess revenue associated with the bundled service which is over the amount related to revenue associated with voice only service shall be recorded in the Total Company column. If voice service is only offered as part of a bundled service, the company shall identify all revenue associated with the bundle of services in the Missouri Jurisdictional column.		
5.	Retail Uncollectible Revenues from telecommunications revenues. (This amount is generally a negative number.)		
6.	RETAIL TOTAL (This amount should equal the total of Rows 1 - 5 above and should also match your Missouri Universal Service Fund Net Jurisdictional Revenue Report amount)		
II. OTHER			
7.	Wholesale Revenues include intrastate switched, special access service revenues, carrier billing and collection revenues, and any other revenues derived from other telecommunications carriers.		
8.	Miscellaneous Revenues² associated with non-retail services , such as, advertising revenues, rent revenues, corporate operations revenues, special billing arrangements, customer operations, plant operations, other incidental regulated revenues, and other revenue settlements. NOTE FOR ILEC ONLY: refer to FCC account #: 5230, 5240, 5250, 5261, 5262, 5263, 5264, 5269, and 5270.)		
9.	Other Uncollectible Revenues from other revenues. (This amount is generally a negative number.)		
10.	High-Cost Federal USF Revenues include all revenues received as support from the Universal Service Fund for the High-Cost program.		
11.	Other Federal USF Revenues include all revenues received as support from the Universal Service Fund for the following programs: Low Income, Schools and Libraries, and Rural Health.		
12.	State USF Revenues include all revenues received as support from the Universal Service Fund.		
13.	TOTAL REVENUES (This amount should equal the total of Rows 6 - 12 above.) Total MO Jurisdictional Revenue (Column A) should match Total Gross Intrastate Operating Revenue on the Statement of Revenue .		

"Telecommunications Service" as defined by Missouri Revised Statutes Section 386.020(54).

"Interconnected Voice over Internet Protocol service" as defined by Section 386.020(23) RSMo

¹ List total regulated revenue and IVoIP revenue provided by a registered company and, if applicable, non-regulated revenue for company name as listed at the top of this page. (This form may be submitted by an affiliate, but a separate form must be completed by each certificated or registered entity. Do not include revenues for any company NOT listed at the top of the page.

² If you have miscellaneous revenue related to retail telecommunications services, then enter it in Row 1



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7. Low Income and Disabled Universal Service Fund Subscriber Quantities

Do you offer basic local telecommunications service or IVoIP service as listed under 386.020 RSMo.?

Yes

No

If yes, please quantify the number of low income and disabled subscribers as reported to USAC (federal support, Form 497) and to the Missouri Universal Service Fund administrator for the past calendar year. (Insert "0"s if you do not have such subscribers.)

	Number of Missouri Low Income Subscribers	Number of Missouri Disabled Subscribers
January	0	0
February	0	0
March	0	0
April	0	0
May	0	0
June	0	0
July	0	0
August	0	0
September	0	0
October	0	0
November	0	0
December	0	0
TOTAL:	0	0



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Relay Missouri Annual Billing, Collections and Retention

9. Do you offer basic local telecommunications service or IVoIP service as listed under 386.020 RSMo.?

Yes No

If yes, complete the following:

Month	Relay Missouri Revenue Collected (collected or received, according to your record-keeping methods)		Relay Missouri Retention Amount (of the amount collected)		Relay Missouri Revenue Remitted to Commission (of the amount collected)	
	**	**	**	**	**	**
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Total	\$0.00		\$0.00		\$0.00	

10. Please indicate the per line value of the Relay Missouri Surcharge you charge your customers each month.

\$0.00

11. If your firm did not impose the Relay Missouri Surcharge, please explain:



Annual Customer Proprietary Network Information (CPNI) Compliance Certificate

(A copy of a company's FCC CPNI filing will suffice for the required descriptions for all items except H.2.)

Check this box if the company submitted its annual CPNI filing for this year in a separate filing to the MO Public Service Commission that is not attached to the company's annual report. If this box is not checked, please complete the requested items shown below:

13. The company affirms having established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160(7).

Indicate which of the following apply with Y (Yes) or N (No).

- A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Attached is a brief description of the company's system.
- B. The company has implemented personnel training as to when personnel are or are not authorized to use CPNI including an express disciplinary process. Attached is a brief description of the company's training and disciplinary process.
- C. The company maintains records for at least one year of sales and marketing campaigns of its own, its agents, affiliates, joint venture partners and any independent contractors, that use its customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. Attached is a brief description of the company's record maintenance system.
- D. The company has a supervisory review process for outbound marketing situations. Attached is a brief description of the company's review process.
- E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly. Attached is a brief description of the company's procedures.

Indicate which of the following apply with a check mark in the appropriate box for each item (F - H).

F. Actions Taken - Select one of the options below checking the box next to it.

- 1. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.
- 2. The company has taken actions against an individual or entity that unlawfully obtains, uses, discloses or sells CPNI, a description of which is attached.

G. Complaints Received - Select one of the options below checking the box next to it.

- 1. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
- 2. The company has received customer complaints in the past year concerning the unauthorized release of CPNI, a summary of which is attached.

H. Sharing CPNI Information - Select one of the options below checking the box next to it.

- 1. The company does not share CPNI with joint venture partners or independent contractors (except for billing and collection services)
- 2. The company obtains OPT-IN approval from customers before disclosing a customer's CPNI to its joint venture partners or independent contractors (except for billing and collection services). The company enters into confidentiality agreements that comply with 4 CSR 240-33.160(3)(A)3 if the company shares CPNI with agents, affiliates, joint venture partners, or independent contractors. Attached is a description of how the agreements comply with MoPSC rules for sharing information with such entities.

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VERIFICATION

The foregoing report must be verified by the oath of the President, Treasurer, General Manager or Receiver of the company. The oath required may be taken before any person authorized to administer an oath (Notary Public) by the laws of the State in which the same is taken.

OATH

State Of GEORGIA }
County Of DOUGLAS } ss:

Susan Cockerham makes oath and says that
Name of Affiant (Company Official/Representative)

s/he is Attorney In Fact
Official Title of the Affiant (Company Official/Representative)

of STi Prepaid , LLC
Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 3100 Cumberland Boulevard, Suite 900 Atlanta GA 30339
Address and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, 2) examined (and updated as applicable) the company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct, and 3) read the CPNI Certification, chosen the applicable alternatives and attached all required documentation, which is a true and correct description of the company's CPNI safeguards.

from January 1, 2009, to and including December 31, 2009
Month/Day Year Month/Day Year

Susan Cockerham
Signature of Affiant (Company Official/Representative)

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 28th day of June, 2010

My Commission expires May 6, 2012

David Weidenborner
Signature of Notary Public

When filing this form electronically, electronic signatures are acceptable. See the instructions for details.



Annual CPNI Compliance Certificate

Name of company covered by this certification: STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP

Date: 4/22/2010

I, Susan Cockerham, certify that I am the Attorney In Fact for the company named above, and in my capacity have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160(7).

- A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. *[Explain the company's system.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not provide and/or use CPNI for marketing purposes. In the event STi decides to use CPNI for marketing purposes, customer records will be marked clearly as to whether permission for use or disclosure of customer information for marketing of communications related services has been granted. For customers whose records are not marked showing permission has been granted, STi employees will assume permission has not been granted.

- B. The company has implemented personnel training as to when they are and are not authorized to use CPNI including an express disciplinary process. *[Briefly explain the company's training and disciplinary process.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP provides training to all new employees on policy and procedure with regard to the protection and appropriate access and use of CPNI. Employees involved in misuse or inappropriate disclosure of customer information are subject to employee disciplinary action, including possible termination from employment.

- C. The company maintains records for at least one year of their own, their agents' their affiliates', their joint venture partners' or their independent contractors' sales and marketing campaigns that use their customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. *[Briefly explain how such records are maintained.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP has not campaigned products or services that use CPNI. In the event STi decides to use CPNI for marketing campaigns, upon completion of such a marketing campaign, or at regular intervals during the campaign, the appropriate supervisor will review the campaign to ensure the use of customer information is in accord with STi's policy for safeguarding CPNI. Copies of such evaluations will be sent to regulatory personnel for maintenance in the record of the campaign.

- D. The company has a supervisory review process for outbound marketing situations. *[Explain the company's process.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not use customer information for marketing purposes. In the event STi decides to use CPNI for marketing purposes, STi has developed a supervisory review process. Before a supervisor may authorize employees to use customer information for marketing purposes, the proposed use of customer information must be reviewed and approved by regulatory personnel to assure the proposed use conforms with STi's policy for safeguarding CPNI and applicable federal regulations. Records of these reviews, including a description of the campaign, the specific customer information used in the campaign,

and what products and services were offered as part of the campaign, will be maintained by regulatory personnel.

E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly. *[Explain the company's procedures.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP offers prepaid calling card and casual calling services (e.g. 10-10 dial-around services). STi does not know the identity or address of the end users of the services it provides. STi does not use customer information for marketing purposes. In any instance in which the opt-out mechanism for customer approval for use of customer information in marketing does not work properly to such a degree that customers' inability to opt-out is more than an anomaly, the appropriate supervisor immediately will notify regulatory personnel, who will provide the required notification to the Federal Communications Commission.

F. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI. *[If the company has taken such action, please explain the action.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

G. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. *[If the company has received complaints, provide a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP offers prepaid calling card and casual calling services (e.g. 10-10 dial-around services). STi does not know the identity or address of the end users of the services it provides. STi has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

H. The company does not share CPNI with joint venture partners or independent contractors *(except for billing and collection services)*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not share CPNI with joint venture partners or independent contractors.

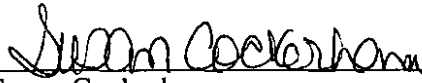
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Annual Customer Proprietary Network)
Information Certification pursuant to)
Missouri PSC rule 4 CSR 240-33.160(7)) Filing No. BCPN-2009-

AFFIDAVIT OF SUSAN COCKERHAM

STATE OF GEORGIA)
) ss:
COUNTY OF DOUGLAS)

Susan Cockerham, Attorney In Fact, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying CPNI compliance certificate and that the facts therein are true and correct to the best of his knowledge and belief.



Susan Cockerham
Attorney In Fact
(770) 956-7525 Ext. 1291
Susan.duggan@thomsonreuters.com

Subscribed and affirmed before me this 22ND day of April 2010
I am commissioned as a notary public within the County of Douglas,
State of Georgia and my commission expires on MAY 6, 2012

NOTARY PUBLIC