

# LEAST COST ROUTING, INC.

## 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 IVOLP PROVIDER

FILED<sup>2</sup>

APR 06 2010

## ANNUAL REPORT TO THE MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public  
Service Commission

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

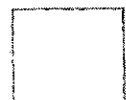
Please select how the company is certificated or registered with the Commission under the Company Name as shown above (check all that apply):

- ☐ Incumbent Local Telecommunications Company (not competitively classified ILEC)
- ☐ Incumbent Local Exchange Telecommunications Company (competitively classified ILEC)
- ☐ Competitive Local Exchange Telecommunications Company (CLEC)
- ☒ 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:

- ☒ **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:  
(link placeholder)



For use  
when filing  
under seal

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

<u>7901 Jones Branch Drive, Suite 900, Mclean, VA- 22102-3316</u>			<u>703-902-2800</u>
Company Street Address			Telephone Number
<u>7901 Jones Branch Drive, Suite 900</u>			<u>703-748-8019</u>
Company Mailing Address			Fax Number
<u>Mclean</u>	<u>VA</u>	<u>22102-3316</u>	<u>kcohen@primustel.com</u>
City	State	Zip	E-Mail Address

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

<input checked="" type="checkbox"/> Corporation	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> LP
<input type="checkbox"/> Partnership	<input type="checkbox"/> LLC	<input type="checkbox"/> 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>KEN COHEN</u>			<u>703-902-2806</u>
Name			Telephone Number
<u>7901 Jones Branch Drive, Suite 900, Mclean, VA- 22102-3316</u>			<u>703-327-9561</u>
Street Address			Fax Number
<u>7901 Jones Branch Drive, Suite 900</u>			<u>kcohen@primustel.com</u>
Mailing Address			E-mail Address
<u>Mclean</u>	<u>VA</u>	<u>22102-3316</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>Chairman and CEO</u>	<u>K. PAUL SINGH</u>
<u>EVP and Secretary</u>	<u>JOHN F. DEPODESTA</u>
<u>CFO &amp; Assistant Secretary</u>	<u>THOMAS R. KLOSTER</u>
<u>VP &amp; Chief Accounting Officer</u>	<u>JAMES C. KEELEY</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.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

Row	Revenues:	MO Jurisdictional (Column A)	Total Company <sup>1</sup> (Column B)
<b>I. RETAIL</b>			
1.	<b>Local Service Revenues</b> 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 IVolP service.		
2.	<b>Interexchange Revenues</b> include revenues attributed to interexchange telecommunications services such as toll services, 800 services, interexchange operator services and interexchange IVolP services.	\$ 7,835.00	\$ 285,401.00
3.	<b>Non-Switched Telecommunications Service Revenues</b> 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.	<b>Bundled or Packaged Revenues</b> 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.	<b>Retail Uncollectible Revenues</b> from telecommunications revenues. (This amount is generally a negative number.)		
6.	<b>RETAIL TOTAL</b> (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)	\$ 7,835.00	\$ 285,401.00
<b>II. OTHER</b>			
7.	<b>Wholesale Revenues</b> include intrastate switched, special access service revenues, carrier billing and collection revenues, and any other revenues derived from other telecommunications carriers.		
8.	<b>Miscellaneous Revenues<sup>2</sup> associated with non-retail services</b> , such as, advertising revenues, rent revenues, corporate operations revenues, special billing arrangements, customer operations, plant operations, other incidental regulated revenues, and other revenue settlements. ( <b>NOTE FOR ILEC ONLY:</b> refer to FCC account #s: 5230, 5240, 5250, 5261, 5262, 5263, 5264, 5269, and 5270.)		
9.	<b>Other Uncollectible Revenues</b> from other revenues. (This amount is generally a negative number.)		
10.	<b>High-Cost Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the High-Cost program.	N/A	
11.	<b>Other Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the following programs: Low Income, Schools and Libraries, and Rural Health.	N/A	
12.	<b>State USF Revenues</b> include all revenues received as support from the Universal Service Fund.		
13.	<b>TOTAL REVENUES</b> (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 <b>Statement of Revenue</b> .	\$ 7,835.00	\$ 285,401.00

<sup>1</sup>"Telecommunications Service" as defined by Missouri Revised Statutes Section 386.020(54).

<sup>2</sup>"Interconnected Voice over Internet Protocol service" as defined by Section 386.020(23) RSMo.

1 List total regulated revenue and IVolP 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.



Annual Report of LEAST COST ROUTING, INC.

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

**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		
February		
March		
April		
May		
June		
July		
August		
September		
October		
November		
December		
<b>TOTAL:</b>	0	0



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filing under seal

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**8.**

### Line Quantities for Local Voice Service & IVoIP Service<sup>1</sup>

[illegible]

<sup>1</sup> See instructions for additional clarification about filling out this page.

<sup>2</sup> **Exchange** refers to areas as listed in ILEC tariffs. (Exchanges are not always the same as rate centers, wire centers and central offices.)

<sup>3</sup> **Facility-based** refers to lines served whereby your company or an affiliate owns the switch and/or local loop.

<sup>4</sup> **Resale/UNE** refers to lines served whereby your company leases all switch and loop facilities from a non-affiliated carrier either through an agreement or a discounted tariffed rate.

<sup>5</sup> **Wholesale to Non-registered Nomadic IVoIP Providers** refers to arrangements where your company is providing wholesale services for a nomadic IVoIP provider who is not registered with the Missouri PSC. (Do not use this column for retail line quantities or if your company sets the end user's rates.)

**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						

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

\_\_\_\_\_

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

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## 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.

**F. Actions Taken** - Select one of the options from the drop-down box below  
(by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

**G. Complaints Received** - Select one of the options from the drop-down box below (by clicking the cell below and then clicking on the arrow to the right of the box directly below):

1. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

**H. Sharing CPNI Information** - Select one of the options from the drop-down box below  
(by clicking the cell below and then clicking on the arrow to the right of the box directly below):

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

Annual Report of **LEAST COST ROUTING, INC.**

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

**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 VIRGINIA }  
 County Of FAIRFAX } ss:

THOMAS R. KLOSTER makes oath and says that  
 Name of Affiant (Company Official/Representative)

s/he is CFO  
 Official Title of the Affiant (Company Official/Representative)

of LEAST COST ROUTING, INC.  
 Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 7901 Jones Branch Dr. # 900, Mclean, V.A. 22102-3316  
 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

Thomas R. Kloster  
 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 30th day of MARCH, 2010

My Commission expires 31 AUGUST, 2010



Kari A. Kowalek  
 Signature of Notary Public





March 1, 2010

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC, 20554

RE: Primus Telecommunications, Inc. CPNI Compliance Certifications EB Docket # 06-36

Dear Ms. Dortch:

On behalf of Primus Telecommunications, Inc. and pursuant to 47 C.F.R. Section 64.2009 (e), enclosed is the Company's 2009 CPNI Certification.

Very yours truly,

A handwritten signature in dark ink, appearing to read "Theresa Walker". The signature is fluid and cursive, with the first name "Theresa" being more prominent than the last name "Walker".

Theresa A. Walker

Enclosures

cc: Enforcement Bureau Telecommunications Consumer Division (2 copies)  
Best Copy and Printing, Inc. (via email)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

**Date filed:** March 1, 2010

**Name of company covered by this certification:** Primus Telecommunications, Inc.

**Form 499 Filer ID:** 811564 (consolidated)

**Name of signatory:** Thomas R. Kloster

**Title of signatory:** Chief Financial Officer

I, Thomas R. Kloster, certify that I am an officer of Primus Telecommunications, Inc. ("Primus"), and acting as an agent of Primus that I have personal knowledge that Primus 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 Primus's procedures ensure Primus is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

Primus has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

Primus has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Thomas R. Kloster  
Thomas R. Kloster  
Chief Financial Officer  
Primus Telecommunications, Inc.

**PRIMUS TELECOMMUNICATIONS, INC.**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

Primus Telecommunications, Inc. ("Primus") has a policy of providing regular written CPNI notices to all customers and seeks to obtain written approval from each customer to use CPNI for marketing purposes, and may also seek opt-out consent consistent with the FCC's rules. Primus also provides existing customers with the ability to change or rescind their consent to its use of their CPNI at any time. Primus CPNI notices explain the customers' CPNI rights in accordance with the FCC's CPNI rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from Primus that is based upon Primus's use of their CPNI. From time to time, Primus may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. Primus maintains records of customer approval and the delivery of its CPNI notices for at least one year.

Primus has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, Primus maintains a database for tracking CPNI restricted accounts (those accounts for which written approval has not been obtained from the customer) (the "Data Base"). In addition, Primus's applicable systems have been designed so as to clearly show whether a customer has approved the use of CPNI for marketing purposes. Primus representatives who market to existing customers are required to check the Data Base and Primus's internal systems to determine whether they must refrain from marketing to specific customers. If a customer is listed in the Data Base, Primus representatives are not permitted to use CPNI to market services to that customer.

As permitted by the CPNI rules, Primus may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of Primus, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

While Primus occasionally shares CPNI with third parties solely to provide services to its customers, Primus does not share, sell, lease or otherwise provide CPNI to any third party for the purposes of marketing any services.

Primus maintains a record for at least one year of its own and affiliates' sales and marketing campaigns that use customers' CPNI. Primus has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review by Primus senior marketing personnel who are responsible for approving any proposed outbound marketing requests that would require customer approval. Additionally, Primus marketing supervisors monitor customer calls from time-to-time to assure that customer accounts and information are being accessed properly by the employees and consistent with Primus's CPNI policies.

All Primus employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation that is based upon the policies and procedures set forth in Primus CPNI Policy. Moreover, a summary of Primus CPNI policies are included in its Employee Handbook. All employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All Primus employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by Primus. Employees who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI are subject to discipline, which may include termination.

Primus has in place procedures to ensure that it will provide written notice to the FCC within five business days of it becoming aware of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) Primus name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether Primus has taken any action; (vii) a copy of the notice provided to customer(s); and (viii) contact information. Primus will submit the above letter even if it offers other methods by which its customers may opt-out.

Primus has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, Primus will notify affected customers. Primus will maintain a record of any CPNI-related breaches for a period of at least two years.

Primus has implemented procedures whereby it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. In order to authenticate a customer's identity prior to disclosing CPNI, Primus authenticates the customer using a variety of methods. Primus does not provide call detail records over the phone. Call detail records are provided to a customer's address of record (either physical address or e-mail) or to the customer's telephone number of record. Primus has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. Primus has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms with the relevant FCC rules.

# Least Cost Routing, Inc.

## Income Statement

	<u>December 31, 2008</u>	<u>December 31, 2009</u>
<b>Revenue:</b>		
Gross Revenue	403,887.00	285,401.00
Sales Allowance	17,150.00	62,145.00
<b>Net Revenue:</b>	386,737.00	223,256.00
<b>Direct Costs:</b>		
Depreciation & Amortization		
Network Costs	11,727.00	10,143.00
<b>Total Direct Cost</b>	11,727.00	10,143.00
<b>Direct Margin:</b>	375,010.00	213,113.00
<b>Operating Costs:</b>		
Salaries & Wages		
Other Operating Expense	94,573.00	68,454.00
<b>Total Operating Costs</b>	94,573.00	68,454.00
<b>Operating Margin:</b>	280,437.00	144,659.00
Income Taxes		
Other		
Interest Expense		
Foreign Currency Transaction		
<b>Net Income:</b>	280,437.00	144,659.00