CERTIFICATE OF COMPLIANCE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: March 2, 2015
2. Name of company covered by this certification: Primus Telecommunications, Inc.
3. Form 499 Filer ID: 811564 (consolidated)
4. Name of Signatory: Gerry Vanderpost
5. Title of Signatory: Vice President of Finance

Certification:

I, Gerry Vanderpost, 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 set forth in 47 C.F.R. § 64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year, including any proceedings instituted in the courts or any state or federal regulatory agency. I am not aware of any processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115.

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

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject the Company to enforcement actions.

Gerry Vanderpost
Vice President of Finance
Primus Telecommunications, Inc.
February 27, 2015

PRIMUS TELECOMMUNICATIONS, INC.
STATEMENT OF CPNI COMPLIANCE PROCEDURES

Primus Telecommunications, Inc. ("Primus" or "the Company") 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.