June 30, 2008

REDACTED FOR PUBLIC INSPECTION

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket No. 05-68 - Officer Certification for First Quarter 2008

Dear Ms. Dortch:

This Officer Certification ("Certification") is filed on behalf of STi Prepaid, LLC ("STi Prepaid") under 47 C.F.R. § 64.5001 of the Federal Communications Commission's ("Commission") rules.

I, Richard Rebetti, hereby certify, under penalty of perjury, that I am an officer of STi Prepaid, LLC and I am authorized to make this certification on its behalf. I further certify that the statements in this Officer Certification are correct to the best of my knowledge, information, and belief.

STi Prepaid has provided its percentage of interstate usage ("PIU") factors to those carriers from which STi Prepaid purchased transport services during the first quarter 2008 ("Reporting Period") in accordance with 47 C.F.R. § 64.5001(a).

STi Prepaid's percentage of calling card minutes for the Reporting Period is:

Intrastate – [**Redacted**]
Interstate – [**Redacted**]
International – [**Redacted**]

STi Prepaid's percentages of total interstate and international prepaid calling card service revenues (excluding revenue that is exempt under the military exemption) for the Reporting Period is:

Interstate – [**Redacted**]
International – [**Redacted**]

STi Prepaid will make the required universal service fund contributions for the Reporting Period based on the above information subject to the Commission's rules and regulations governing universal service contributions.

Request for Confidential Treatment. Pursuant to section 0.457(d) of the Federal Communications Commission's ("Commission's") rules and regulations, STi Prepaid requests confidential treatment of the financial information contained in this letter request and its attachments. 47 C.F.R. § 0.457(d)(1)-(2).

The information for which STi Prepaid seeks confidential treatment consists of jurisdictional classification of telecommunications services and financial data about STi Prepaid's operations that customarily would be guarded from competitors and would not be made routinely available for public inspection. *See* 47 C.F.R. § 0.457(d)(2). It includes STi Prepaid's revenues from the provision of interstate and international services and resulting regulatory payment obligations, as well as a break down of prepaid calling card minutes of use by jurisdiction. The Commission recognizes the confidential nature of this information when it collects such information from telecommunications carriers.[1/]

The Freedom of Information Act ("FOIA") protects such information from disclosure because the information includes "trade secrets and commercial or financial information . . . [that is] privileged or confidential."[2/] Public disclosure of this information could be used by competitors of STi Prepaid and could result in competitive harm. As such, the information falls within the scope of section 0.457 of the Commission's rules and should be afforded protection from public inspection.

In the event that STi Prepaid's request for confidential treatment is denied, STi Prepaid respectfully requests notice of that determination prior to making the confidential version of STi Prepaid's Officer Certification available to the public.

In accordance with the Commission's rules, an original and four (4) copies of the public version, and one (1) copy of the confidential version of this filing are being filed with the Office of the Secretary today.

Please date stamp the enclosed return copy and return it in the envelope provided. Should you have questions or require additional information, please contact the undersigned.

Respectfully submitted,

Richard Rebetti

cc: Chief, Pricing Policy Division, Wireline Competition Bureau, Federal Communications Commission
Best Copy and Printing, Inc.

1/ *See Instructions for Completing the Worksheet for Filing Contributions to Telecommunications Relay Service, Universal Service, Number Administration, and Local Number Portability Support Mechanisms*, Telecommunications Reporting Worksheet, FCC Form 499-A at 33 (March 2007) (instructing filers that they may request nondisclosure of the revenue information contained on Form 499-A).

2/ 5 U.S.C. § 552(b)(4).