



## The *CommLaw* Group

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September 30, 2008

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

Re: Serengeti Partners International, Inc. Certification Pursuant to 47 C.F.R. § 64.5001(c)  
WC Docket No. 05-68

Dear Ms. Dortch:

On behalf of Serengeti Partners International, Inc. ("Serengeti Partners"), enclosed herewith please find a redacted, public version and a confidential version of Serengeti Partners' prepaid calling card officer certification ("Officer Certification") pursuant to section 64.5001(c) of the Commission's rules, 47 C.F.R. § 64.5001(c), for the Second Quarter of 2008. The public version of this certification, with confidential information redacted, is being filed via ECFS in Docket No. 05-68.

***Request for Confidential Treatment.*** Serengeti Partners, by its undersigned counsel, and pursuant to sections 0.457(d) and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, hereby requests confidential treatment of the information contained in this report and its attachments. The information for which Serengeti Partners seeks confidential treatment consists of Serengeti Partners' percentage of revenue from the provision of interstate and international services, and an identification of prepaid calling card minutes of use by jurisdiction.

Public disclosure of the information contained in this report could be used by Serengeti Partners' competitors, and therefore could result in competitive harm. Accordingly, the information falls within the scope of sections 0.457 and 0.459 of the Commission's rules and should be afforded confidential treatment.

In addition, section 552(b)(4) of the Freedom of Information Act (“FOIA”) protects such information from disclosure because the information includes “trade secrets and commercial or financial information obtained from a person and privileged or confidential.”<sup>1</sup>

On the basis of the foregoing, Serengeti Partners requests that its certification pursuant to 47 C.F.R. § 64.5001(c) be accorded confidential treatment.

In the event that Serengeti Partners’ request for confidential treatment is denied, Serengeti Partners respectfully requests that advance notice of such decision be communicated to the undersigned.

Should you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

*/s/ Jonathan S. Marashlian*

Jonathan S. Marashlian

Chief, Pricing Policy Division, Wireline Competition Bureau  
Best Copy and Printing, Inc. (fcc@bpciweb.com)

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<sup>1</sup> 5 U.S.C. § 552(b)(4).

**SERENGETI PARTNERS INTERNATIONAL, INC.**  
**OFFICER CERTIFICATION PURSUANT TO 47 C.F.R. § 64.5001(c)**  
**WC DOCKET NO. 05-68**

I, Christopher Mbaku, certify, under penalty of perjury, that I am an officer of Serengeti Partners International, Inc. (“Serengeti Partners”), and that I am authorized to make this certification on the company’s behalf. I further certify that the statements in this certification are true and accurate to the best of my knowledge, information, and belief.

Serengeti Partners has complied with the reporting requirements described in 47 C.F.R. § 64.5001(a), by reporting prepaid calling card percentage of interstate use (“PIU”) factors, and call volumes from which these factors were calculated, based on not less than a one-day representative sample, from those carriers from which it purchased transport services during the Second Quarter of 2008.

Serengeti Partners’ percentages of total intrastate, interstate, and international calling card minutes for the Second Quarter of 2008 are as follows:

Intrastate	Redacted
Interstate	Redacted
International	Redacted

Serengeti Partners’ percentages of total prepaid calling card service revenues (excluding revenue from prepaid calling cards sold by, to, or pursuant to contract with the Department of Defense (“DoD”) or a DoD entity) attributable to interstate and international calls for the Second Quarter of 2008 are as follows:

Interstate	Redacted
International	Redacted

Serengeti Partners does not contribute directly to the Universal Service Fund (“USF”) by collecting and remitting universal service fund payments directly to the Universal Service Administrative Company (“USAC”). The company qualifies for the International Revenue Exemption pursuant to 47 C.F.R. § 54.706(c). In addition, based on its interstate revenues, the company qualifies for the *de minimis* exception. Pursuant to FCC rules, under these circumstances, Serengeti Partners is not a direct contributor to the universal service fund.

*/s/ Christopher Mbaku*

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Christopher Mbaku  
CEO  
September 30, 2008