

H | K | G

Hinton, Kreditor & Gronroos, LLP  
Certified Public Accountants

David R. Hinton, CPA  
Garrett P. Kreditor, CPA  
Eric A. Gronroos, CPA, MBT  
Fred T. Arjani, CPA  
David W. Riley, CPA, JD  
Jorge R. Fernandez, CPA

2006  
FEB, MAY, AUG.

November 9, 2006

Mr. Dean Cary  
President/CEO  
Compass Global, Inc.  
50 Tice Blvd. 3<sup>rd</sup> Floor  
Woodcliff Lake, NJ 07677

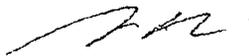
Dear Dean:

Enclosed herewith are the following forms regarding Compass Global, Inc.:

- Form IT-499-Q, Telecommunications Reporting Worksheet with due dates of February, May, and August of 2006. Please sign the forms where indicated, and mail in the envelope provided as soon as possible.

I have enclosed a copy for your files. If you have any questions, please contact me.

Very truly yours,



Brian Kim  
Certified Public Accountant

Enclosures - As stated.

†  
Dean H. Cary - President/CEO  
Compass Global, Inc.  
50 Rice Blvd. Woodbridge, NJ 07077  
Tel: 201-502-0600 • Fax: 201-502-0601 • Email: [dcary@compassglobal.net](mailto:dcary@compassglobal.net)

1/26/07

Dear Sirs:

My accountant who handles our  
USF issuer has told me that  
you all wanted to see the signed  
originals of these forms, even though  
they have already been filed.

Therefore, here are the  
forms you requested. Let me  
know if you need anything  
further on this.

Thanks,  
Dean H. Cary

**FCC Form 499-Q Telecommunications Reporting Worksheet**  
 Quarterly Filing for Universal Service Contributors

Approval by UMS  
 3060-0855

>>> Please read instructions before completing <<<

**Block 1: Contributor Identification Information**

101 Filer 499 ID: **826216**

102 Legal name of reporting entity: **Compass Global, Inc.**

103 IRS employer identification number: **22-3559398**

104 Name telecommunications provider is doing business as: **Compass Global, Inc.**

105 Holding company (All affiliated companies should show same name here.): **0009690256**

106 FCC Registration Number (FRN): **50 Tice Blvd. - 3rd Floor**

107 Complete mailing address of reporting entity's corporate headquarters: **Woodcliff Lake, NJ 07677**

**Block 2: Contact Information**

109 Person who completed this worksheet: First **Brian** M Last **Kim**

109 Telephone number of this person: **(626) 585-0666**

110 Fax number of this person: **(626) 585-1661**

111 Email of this person: **bkim@hkgllp.com**

112 Billing address and billing contact person: **Dean Cary, 50 Tice Blvd. - 3rd Floor, Woodcliff Lake, NJ 07677**  
 [Bills for Universal Service contributions will be sent to this address.]

**Block 3: Contributor Historical and Projected Revenue Information**

113 Year of historical revenue information: **2006**

114 Indicate which quarterly filing this represents:

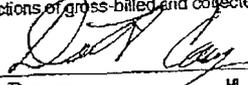
<input type="checkbox"/> February 1	<input type="checkbox"/> October 1 - December 31 (prior year)	<input type="checkbox"/> April 1 - June 30
<input checked="" type="checkbox"/> May 1	<input type="checkbox"/> January 1 - March 31	<input type="checkbox"/> July 1 - September 30
<input type="checkbox"/> August 1	<input type="checkbox"/> April 1 - June 30	<input type="checkbox"/> October 1 - December 31
<input type="checkbox"/> November 1	<input type="checkbox"/> July 1 - September 30	<input type="checkbox"/> January 1 - March 31 (following calendar year)

Historical billed revenues with no allowance or deductions for uncollectibles. See instructions.	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications	5,140,773	42,020	5,098,753
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	7,085,169	181,482	6,903,687
117 All other goods and services	1,284,061	Column (b) and (c) not requested	
118 Gross-billed revenues from all sources [sum of above]	13,510,003	for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		200,000	6,800,000
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		200,000	6,800,000

**Block 4: CERTIFICATION: to be signed by an officer of the reporting entity**

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature: 

123 Printed name of officer: First **Dean** M Last **Cary**

124 Position with reporting entity: **CEO**

125 Email of officer || Required if available ||: **deancary@compassglobal.net**

126 Date: **11/07/06**

127 This filing is:  Original filing  Revised filing [revisions due within 45 days of original filing deadline]

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THIS WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. 8931

Save time, avoid problems - file electronically at <http://forms.universalservice.org>

FCC Form 499-Q August 2006

**FCC Form 499-Q Telecommunications Reporting Worksheet**

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

Approval by OMB  
3060-0855

**Block 1: Contributor Identification Information**

101 Filer 499 ID: 826216

102 Legal name of reporting entity: **Compass Global, Inc.**

103 IRS employer identification number: **22-3559398**

104 Name telecommunications provider is doing business as: **Compass Global, Inc.**

105 Holding company (All affiliated companies should show same name here.)

106 FCC Registration Number (FRN): **0009690256**

107 Complete mailing address of reporting entity's corporate headquarters: **50 Tice Blvd. - 3rd Floor  
Woodcliff Lake, NJ 07677**

**Block 2: Contact Information**

108 Person who completed this worksheet: **Mr. Brian W. Kim**

109 Telephone number of this person: **(626) - 585-0666**

110 Fax number of this person: **(626) - 585-1661**

111 Email of this person: **Bkim@hkgllp.com**

112 Billing address and billing contact person: **Dean Cary, 50 Tice Blvd. - 3rd Floor,  
Woodcliff Lake, NJ 07677**  
(Bills for Universal Service contributions will be sent to this address.)

**Block 3: Contributor Historical and Projected Revenue Information**

113 Year of historical revenue information

114 Indicate which quarterly filing this represents:

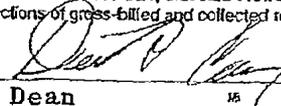
<input checked="" type="checkbox"/> February 1	<b>Historical revenues for</b> October 1 - December 31 (prior year)	<b>Projected revenues for</b> April 1 - June 30
<input type="checkbox"/> May 1	January 1 - March 31	July 1 - September 30
<input type="checkbox"/> August 1	April 1 - June 30	October 1 - December 31
<input type="checkbox"/> November 1	July 1 - September 30	January 1 - March 31 (following calendar year)

	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications	5,129,309	64,662	5,064,646
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	7,049,291	213,878	6,835,413
117 All other goods and services	1,335,743	Column (b) and (c) not requested	
118 Gross-billed revenues from all sources (sum of above)	13,514,343	for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		170,000	8,830,000
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		170,000	8,830,000

**Block 4: CERTIFICATION: to be signed by an officer of the reporting entity**

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 0.217, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature: 

123 Printed name of officer: **First Dean W. Last Cary**

124 Position with reporting entity: **CEO**

125 Email of officer (Required if available): **deancary@compassglobal.net**

126 Date: **11/07/06**

127 This filing is:  Original filing  Revised filing (revisions due within 45 days of original filing deadline)

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

**FCC Form 499-Q Telecommunications Reporting Worksheet**  
 Quarterly Filing for Universal Service Contributors

Approval by OMB  
3060-0855

>>> Please read instructions before completing <<<

**Block 1: Contributor Identification Information**

101 Filer 499 ID: 826216

102 Legal name of reporting entity: **Compass Global, Inc.**

103 IRS employer identification number: **22-3559398**

104 Name telecommunications provider is doing business as: **Compass Global, Inc.**

105 Holding company [All affiliated companies should show same name here.]

106 FCC Registration Number (FRN): **0009690256**

107 Complete mailing address of reporting entity's corporate headquarters: **50 Tice Blvd. - 3rd Floor  
Woodcliff Lake, NJ 07677**

**Block 2: Contact Information**

108 Person who completed this worksheet: First **Brian** Last **Kim**

109 Telephone number of this person: **(626) - 585-0666**

110 Fax number of this person: **(626) - 585-1661**

111 Email of this person: **bkim@hkgllp.com**

112 Billing address and billing contact person: (Bills for Universal Service contributions will be sent to this address.)  
**Dean Cary, 50 Tice Blvd. - 3rd Floor,  
Woodcliff Lake, NJ 07677**

**Block 3: Contributor Historical and Projected Revenue Information**

113 Year of historical revenue information

114 Indicate which quarterly filing this represents:

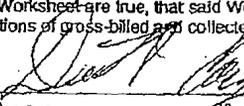
<input type="checkbox"/> February 1	Historical revenues for October 1 - December 31 (prior year)	Projected revenues for April 1 - June 30
<input type="checkbox"/> May 1	January 1 - March 31	July 1 - September 30
<input checked="" type="checkbox"/> August 1	April 1 - June 30	October 1 - December 31
<input type="checkbox"/> November 1	July 1 - September 30	January 1 - March 31 (following calendar year)

Historical billed revenues with no allowance or deductions for uncollectibles. See Instructions.	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications	5,716,865	24,872	5,691,993
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	8,958,375	167,447	8,790,928
117 All other goods and services	1,511,632	Column (b) and (c) not requested	
118 Gross-billed revenues from all sources [sum of above]	16,186,872	for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		200,000	8,800,000
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		200,000	8,800,000

**Block 4: CERTIFICATION: to be signed by an officer of the reporting entity**

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature: 

123 Printed name of officer: First **Dean** Last **Cary**

124 Position with reporting entity: **CEO**

125 Email of officer (Required if available): **deancary@compassglobal.net**

126 Date: **11/07/08**

127 This filing is:  Original filing  Revised filing (revisions due within 45 days of original filing deadline)

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 841-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1014

# FedEx Express US Airbill

FedEx Tracking Number **8543 4616 7370**

See back for peel and stick application instructions.

**1 From** Please print legibly  
 Date 1/26/07 Sender's FedEx Account Number 1760-3913-9

Sender's Name DEAN CARY Phone (201) 802-0600

Company COMPASS GLOBAL X101

Address 50 TICE BLVD STE 3

City WOODCLIFF LAKE State NJ ZIP 07677-7658

**2 Your Internal Billing Reference** SPYDHAL

**3 To**  
 Recipient's Name Form 499 DATA Phone 800-641-8722

Company Collection Agency

Recipient's Address C/O USAC

We account deliver to P.O. boxes or P.O. ZIP codes.  
 Address 2000 L ST. NW # 200

City WASHINGTON State DC ZIP 20036

0319400049

**Try online shipping at fedex.com**

By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability. Questions? Go to our Web site at fedex.com or call 1.800.GoFedEx.1.800.463.3333.

**4a Express Package Service** In use SATURDAY Delivery, see Section 6. Packages up to 120 lbs.

FedEx Priority Overnight Next business morning\*  FedEx Standard Overnight Next business afternoon\*  FedEx First Overnight Earliest next business morning delivery to select locations\*

FedEx 2Day Second business day\*  FedEx Express Saver Third business day\*

**4b Express Freight Service** To add SATURDAY Delivery, see Section 6. Packages over 150 lbs.

FedEx 1Day Freight Next business day\*  FedEx 2Day Freight Second business day\*  FedEx 3Day Freight Third business day\*

**5 Packaging**  FedEx Pak Includes FedEx Label Plus. FedEx Large Pak, not FedEx Sure Post.  FedEx Box  FedEx Tube  Other

FedEx Envelope\* Include FedEx address in Section 2.

**6 Special Handling** Include FedEx address in Section 2.

SATURDAY Delivery Available ONLY for FedEx Priority Overnight, FedEx 2Day, FedEx 1Day Freight, and FedEx 2Day Freight to select ZIP codes.

HOLD Weekday at FedEx Location NOT Available for FedEx First Overnight.  HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight and FedEx 2Day select locations.

Does this shipment contain dangerous goods?  No  Yes See back for details.  Yes Shipper's Declaration not required.  Dry Ice Permitted.  Cargo Aircraft Only

**7 Payment Method** Enter FedEx Acct. No. or Credit Card No. below.

Sender Account No. in Section 2.  Recipient  Third Party  Credit Card  Cash/C

**Total Packages** 1 **Total Weight** 1.02 **Total Declared Value** 00

Your liability is limited to \$100 unless you declare a higher value. See back for details.

**8 NEW Residential Delivery Signature Options** If you require a signature, check here.

No Signature Required Package may be left with an authorized signatory for delivery.  Direct Signature Address at recipient's address may sign for delivery.  Indirect Signature If no one is available at recipient's address, someone at a neighboring address may sign for delivery.

519

Originals already filed.  
 Wanted to see original signed copies.



Attachment 6-D

2007 Forms 499-Q  
February, May

**H | K | G** Hinton, Kreditor & Gronroos, LLP  
Certified Public Accountants

FEB 2007

David R. Hinton, CPA  
Garrett P. Kreditor, CPA  
Eric A. Gronroos, CPA, MBT  
Fred T. Arjani, CPA  
David W. Riley, CPA, JD  
Jorge R. Fernandez, CPA

January 24, 2007

Mr. Dean Cary  
President/CEO  
Compass Global, Inc.  
50 Tice Blvd. 3<sup>rd</sup> Floor  
Woodcliff Lake, NJ 07677

Dear Dean:

Enclosed herewith is the following form regarding Compass Global, Inc.:

- Form 499-Q - Telecommunications Reporting Worksheet with the due date of February 1, 2007. Please sign the form where indicated, and mail in the envelope provided as soon as possible.

I have enclosed a copy for your files. Should you have any questions, please contact me.

Very truly yours,



Brian Kim  
Certified Public Accountant

Enclosures - As stated.

**FCC Form 499-Q Telecommunications Reporting Worksheet**

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

Approval by OMB  
3060-0855

**Block 1: Contributor Identification Information**

101	Filer 499 ID	826216
102	Legal name of reporting entity	Compass Global, Inc.
103	IRS employer identification number	22-3559398
104	Name telecommunications provider is doing business as	Compass Global, Inc.
105	Holding company (All affiliated companies should show same name here.)	
106	FCC Registration Number (FRN)	0009690256
107	Complete mailing address of reporting entity's corporate headquarters	50 Tice Blvd. - 3rd Floor Woodcliff Lake, NJ 07677

**Block 2: Contact Information**

108	Person who completed this worksheet	First Brian Last Kim
109	Telephone number of this person	(626) 585-0666
110	Fax number of this person	(626) 585-1661
111	Email of this person	bkim@hkgilp.com
112	Billing address and billing contact person: <small>[Bills for Universal Service contributions will be sent to this address.]</small>	Dean Cary, 50 Tice Blvd. - 3rd Floor Woodcliff Lake, NJ 07677

**Block 3: Contributor Historical and Projected Revenue Information**

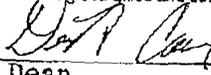
113	Year of historical revenue information			
114	Indicate which quarterly filing this represents	<input checked="" type="checkbox"/> February 1 <input type="checkbox"/> May 1 <input type="checkbox"/> August 1 <input type="checkbox"/> November 1	Historical revenues for October 1 - December 31 (prior year) January 1 - March 31 April 1 - June 30 July 1 - September 30	Projected revenues for April 1 - June 30 July 1 - September 30 October 1 - December 31 January 1 - March 31 (following calendar year)

	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115	6,567,697	31,431	6,536,266
116	8,781,980	159,018	8,622,962
117	1,405,048	Column (b) and (c) not requested	
118	16,754,725	for Lines 117 and 118	
119		160,000	9,000,000
120		160,000	9,000,000

**Block 4: CERTIFICATION: to be signed by an officer of the reporting entity**

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122	Signature	
123	Printed name of officer	First Dean Last Cary
124	Position with reporting entity	CEO
125	Email of officer <small>   Required if available   </small>	deancary@compassglobal.net
126	Date	1/26/07
127	This filing is:	<input checked="" type="checkbox"/> Original filing <input type="checkbox"/> Revised filing [revisions due within 45 days of original filing deadline]

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 200 L Street, N.W. Suite 200 Washington DC, 20036  
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (868) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THIS WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

Save time, avoid problems - file electronically at

<http://forms.universalservice.org>

FCC Form 499-Q  
August 2006

**FCC Form 499-Q Telecommunications Reporting Worksheet**  
**Quarterly Filing for Universal Service Contributors**

Approval by OMB  
3060-0355

>>> Please read instructions before completing <<<

**Block 1: Contributor Identification Information**

101 Filer 499 ID: 101      Filer 499 ID: 826215

102 Legal name of reporting entity: Compass Global, Inc.

103 IRS employer identification number: 22-3559398

104 Name telecommunications provider is doing business as: Compass Global, Inc.

105 Holding company (All affiliated companies should show same name here.):

106 FCC Registration Number (FRN): 0009-6902-56

107 Complete mailing address of reporting entity's corporate headquarters:  
 Street 1: 50 Tice Blvd., 3rd Floor      City: Woodcut Lake      State: NJ      Zip: 07477  
 Street 2:  
 Street 3:  
 Country:

**Block 2: Contact Information**

108 Person who completed this worksheet: First: Brian      MI      Last: Kim

109 Telephone number of this person: ( 926 ) - 585-0666      ext:

110 Fax number of this person: ( 926 ) - 585-1661

111 Email of this person: bkim@hkgllc.com

112 Billing address and billing contact person (Bills for Universal Service contributions will be sent to this address):  
 Street 1: 50 Tice Blvd., 3rd Floor      City: Woodcut Lake      First: Brian      Last: Kim  
 Street 2:      St: NJ      Zip: 07477      Pk: 201      502-4000      Ext:  
 Street 3:      E-Mail: name@note.com      Fax:

**Block 3: Contributor Historical and Projected Revenue Information**

113 Year of historical revenue information: 2007

114 Indicate which quarterly filing this represents:  
 Filing due:  February 1       May 1       August 1       November 1  
 Historical revenues for:  October 1 - December 31 (prior year)       January 1 - March 31       April 1 - June 30       July 1 - September 30  
 Projected revenues for:  April 1 - June 30       July 1 - September 30       October 1 - December 31       January 1 - March 31 (following calendar year)

	Total Revenues (a)	Interstate Revenues (b)	International Revenues (c)
115 Telecommunications provided to other universal service contributors for resale as telecommunications or as interconnected VoIP	\$7,000,000.00	\$32,000.00	\$6,968,000.00
116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues	\$8,840,000.00	\$200,000.00	\$8,640,000.00
117 All other goods and services	\$1,400,000.00	Column (b) and (c) not requested	
118 Gross-billed revenues from all sources [sum of above]	\$17,240,000.00	for Lines 117 and 118	
119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		\$160,000.00	\$9,000,000.00
120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues		\$160,000.00	\$9,000,000.00

**Block 4: CERTIFICATION: to be signed by an officer of the reporting entity**

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature: \_\_\_\_\_

123 Printed name of officer: First: Dean      MI      Last: Cary

124 Position with reporting entity: CEO

125 Email of officer || Required if available ||: deancary@compassglobal.net

126 Date: 05/07/2007

127 This filing is:  Original filing       Revised filing (revisions due within 45 days of original filing deadline)

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 20001 Street, N.W., Suite 200 Washington DC, 20035  
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 841-8722 or via e-mail: Form499@universalservice.org

Attachment 6-E

2007 Form 499-A

2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Approval by OMB  
3060-0855

>>> Please read Instructions before completing. <<<

Annual Filing - due April 1, 2007

Block 1: Contributor Identification Information

During the year, filers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID (If you don't know your number, contact the administrator at (888) 641-8722. If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.) 826216

102 Legal name of reporting entity Compass Global, Inc.

103 IRS employer identification number [Enter 9 digit number] 22-3559398

104 Name telecommunications provider is doing business as Compass Global, Inc.

105 Telecommunications activities of filer (Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance - see directions.)

<input type="checkbox"/> CAP/LEC	<input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale)	<input type="checkbox"/> Coaxial Cable	<input type="checkbox"/> Incumbent LEC
<input type="checkbox"/> Interconnected VoIP	<input type="checkbox"/> Interexchange Carrier (IXC)	<input type="checkbox"/> Local Reseller	<input type="checkbox"/> Operator Service Provider (OSP)
<input type="checkbox"/> Payphone Service Provider	<input checked="" type="checkbox"/> Prepaid Card	<input type="checkbox"/> Private Service Provider	<input type="checkbox"/> Satellite Service Provider
<input type="checkbox"/> Shared-Tenant Service Provider / Building LEC	<input type="checkbox"/> SMR (dispatch)	<input checked="" type="checkbox"/> Toll Reseller	<input type="checkbox"/> Wireless Data
<input type="checkbox"/> Other Local, Other Mobile or Other Toll is checked, describe carrier type / services provided: →		<input type="checkbox"/> Other Local	<input type="checkbox"/> Other Toll

106.1 Holding company name (All affiliated companies must show the same name on this line.)

106.2 Holding company IRS employer identification number [Enter 9 digit number]

107 FCC Registration Number (FRN) [https://svartifoss2.fcc.gov/cores/CoresHome.html] (For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov) 0008-8902-56 [Enter 10 digit number]

108 Management company (If filer is managed by another entity)

109 Complete mailing address of reporting entity corporate headquarters

Note: This address will be used for the ITSP FCC regulatory fee billings unless the appropriate box is checked on Line 208.

110 Complete business address for customer inquiries and complaints

check if same address as Line 109

Street 1 50 Tice Blvd., 3rd Floor  
Street 2  
Street 3  
City Woodcliff Lake State NJ Zip (postal code) 07677 Country if not USA

111 Telephone number for customer complaints and inquiries (Toll-free number if available) (201) - 802-6600 Ext -

112 List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.

a	Forval International Tel	g
b		h
c		i
d		j
e		k
f		

Use an additional sheet if necessary. Each reporting entity must provide all names used for telecommunications activities.

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Block 2-A: Regulatory Contact Information

201 Filer 499 ID (from Line 101)	826216		
202 Legal name of reporting entity (from Line 102)	Compass Global, Inc.		
203 Person who completed this Worksheet	First Brian	MI	Last Kim
204 Telephone number of this person	( 626 ) - 585-0566	ext -	
205 Fax number of this person	( 626 ) - 585-1661		
206 Email of this person <input type="checkbox"/> Required if available -- not for public release <input type="checkbox"/>	bkim@hkglo.com		
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Office Compass Global, Inc. Email (Required if available, not for public release) none@none.com Street1 50 Tice Blvd., 3rd Floor Street2 Street3 City Woodcliff Lake State NJ Zip (postal code) 07677 Country if not USA	Attn First name Dean Phone ( 201 ) - 002-0200 ext. ( ) - Fax ( ) -	Last Cary
check if same name as Line 203 <input type="checkbox"/>			
check if same address as Line 109 <input checked="" type="checkbox"/>			
208 Billing address and billing contact person: (Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.)	Company Compass Global, Inc. Email (Required if available, not for public release) none@none.com Street1 50 Tice Blvd., 3rd Floor Street2 Street3 City Woodcliff Lake State NJ Zip (postal code) 07677 Country if not USA	Attn First name Dean Phone ( 201 ) - 002-0200 ext. ( ) - Fax ( ) -	Last Cary
check if name and address same as Line 207 <input checked="" type="checkbox"/>			
check to use Line 208 information for FCC ITSP regulatory fee bill <input type="checkbox"/>			

Block 2-B: Agent for Service of Process

All carriers and providers of interconnected VoIP must complete Lines 209 through 213. During the year, carriers and providers of interconnected VoIP must refile Blocks 1, 2 and 6 if there are any changes in this section. See instructions.

209 D.C. Agent for Service of Process per 47 U.S.C. § 413	Company	Attn First name Jorold	MI	Last Schlieder
210 Telephone number of D.C. agent	( 202 ) - 393-6222	ext -		
211 Fax number of D.C. agent	( ) -			
212 Email of D.C. agent <input type="checkbox"/> Required if available <input type="checkbox"/>	none@none.com			
213 Complete business address of D.C. agent for hand service of documents	Street1 801 Pennsylvania Ave., NW Street2 Suite 600 Street3 City Washington State DC Zip 20004			
check to use Line 213 information for FCC ITSP regulatory fee bill <input type="checkbox"/>				
(If both Line 208 and Line 213 are checked, Line 208 will be used.)				
214 Local/alternate Agent for Service of Process (optional)	Company	Attn First name	MI	Last
215 Telephone number of local/alternate agent	( ) -	ext -		
216 Fax number of local/alternate agent	( ) -			
217 Email of local/alternate agent <input type="checkbox"/> Required if available <input type="checkbox"/>				
218 Complete business address of local/alternate agent for hand service of documents	Street1 Street2 Street3 City State Zip (postal code) Country if not USA			
check to use Line 216 information for FCC ITSP regulatory fee bill <input type="checkbox"/>				
(If both Line 208 and Line 218 are checked, Line 208 will be used.)				

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Block 2-C: FCC Registration and Contact Information

Filers must refile Blocks 1, 2 and 6 if there are any changes in this section. See instructions.

219 Filer 499 ID [from Line 101]	828216
220 Legal name of reporting entity [from Line 102]	Compass Global, Inc.
221 Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)	First Dean MI Last Cary
222 Business address of individual named on Line 221 check if same as Line 109 <input checked="" type="checkbox"/>	Street1 50 Yee Blvd, 3rd Floor Street 2 Street 3 City Woodcliff Lake State NJ Zip (postal code) 07677 Country if not USA
223 Second ranking company officer, such as Chairman (Must be someone other than the individual listed on Line 221)	First MI Last
224 Business address of individual named on Line 223 check if same as Line 109 <input type="checkbox"/>	Street1 Street 2 Street 3 City State Zip (postal code) Country if not USA
225 Third ranking company officer, such as President or Secretary (Must be someone other than individuals listed on Lines 221 or 223)	First MI Last
226 Business address of individual named on Line 225 check if same as Line 109 <input type="checkbox"/>	Street1 Street 2 Street 3 City State Zip (postal code) Country if not USA

227 Indicate jurisdictions in which the filing entity provides service. Include jurisdictions in which service was provided in the past 15 months and jurisdictions in which service is likely to be provided in the next 12 months.

- |   |   |  |   |  |
|---|---|--|---|--|
| <input type="checkbox"/> Alabama              | <input type="checkbox"/> Guam           | <input type="checkbox"/> Massachusetts         | <input checked="" type="checkbox"/> New York      | <input type="checkbox"/> Tennessee           |
| <input type="checkbox"/> Alaska               | <input type="checkbox"/> Hawaii         | <input type="checkbox"/> Michigan              | <input type="checkbox"/> North Carolina           | <input type="checkbox"/> Texas               |
| <input type="checkbox"/> American Samoa       | <input type="checkbox"/> Idaho          | <input type="checkbox"/> Midway Atoll          | <input type="checkbox"/> North Dakota             | <input type="checkbox"/> Utah                |
| <input type="checkbox"/> Arizona              | <input type="checkbox"/> Illinois       | <input type="checkbox"/> Minnesota             | <input type="checkbox"/> Northern Mariana Islands | <input type="checkbox"/> U.S. Virgin Islands |
| <input type="checkbox"/> Arkansas             | <input type="checkbox"/> Indiana        | <input type="checkbox"/> Mississippi           | <input type="checkbox"/> Ohio                     | <input type="checkbox"/> Vermont             |
| <input type="checkbox"/> California           | <input type="checkbox"/> Iowa           | <input type="checkbox"/> Missouri              | <input type="checkbox"/> Oklahoma                 | <input type="checkbox"/> Virginia            |
| <input type="checkbox"/> Colorado             | <input type="checkbox"/> Johnston Atoll | <input type="checkbox"/> Montana               | <input type="checkbox"/> Oregon                   | <input type="checkbox"/> Wake Island         |
| <input type="checkbox"/> Connecticut          | <input type="checkbox"/> Kansas         | <input type="checkbox"/> Nebraska              | <input type="checkbox"/> Pennsylvania             | <input type="checkbox"/> Washington          |
| <input type="checkbox"/> Delaware             | <input type="checkbox"/> Kentucky       | <input type="checkbox"/> Nevada                | <input type="checkbox"/> Puerto Rico              | <input type="checkbox"/> West Virginia       |
| <input type="checkbox"/> District of Columbia | <input type="checkbox"/> Louisiana      | <input type="checkbox"/> New Hampshire         | <input type="checkbox"/> Rhode Island             | <input type="checkbox"/> Wisconsin           |
| <input type="checkbox"/> Florida              | <input type="checkbox"/> Maine          | <input checked="" type="checkbox"/> New Jersey | <input type="checkbox"/> South Carolina           | <input type="checkbox"/> Wyoming             |
| <input type="checkbox"/> Georgia              | <input type="checkbox"/> Maryland       | <input type="checkbox"/> New Mexico            | <input type="checkbox"/> South Dakota             |  |

228 Year and month filer first provided (or expects to provide) telecommunications in the U.S.  Check if prior to 1/1/1999, otherwise Year 2006 Month 10

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Block 3: Carrier's Carrier Revenue Information

301 Filer 499 ID [from Line 101]	826216				
302 Legal name of reporting entity [from Line 102]	Compass Global, Inc.				
Report billed revenues for January 1 through December 31, 2006. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.	Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
See Instructions regarding percent interstate & international. Revenues from Services Provided for Resale as Telecommunications by Other Contributors in Federal Universal Service Support Mechanisms					
<i>Fixed local service</i>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs					
303.1 Provided as unbundled network elements (UNEs)	\$0.00	0.00	0.00	\$0.00	\$0.00
303.2 Provided under other arrangements	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Per-minute charges for originating or terminating calls</i>					
304.1 Provided under state or federal access tariff	\$0.00	0.00	0.00	\$0.00	\$0.00
304.2 Provided as unbundled network elements or other contract arrangement	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Local private line &amp; special access service</i>					
305.1 Provided to other contributors for resale as telecommunications	\$0.00	0.00	0.00	\$0.00	\$0.00
305.2 Provided to other contributors for resale as interconnected VoIP (All such revenue for 2006 must be reported as end-user revenue)					
306 Payphone compensation from toll carriers	\$0.00	0.00	0.00	\$0.00	\$0.00
307 Other local telecommunications service revenues	\$0.00	0.00	0.00	\$0.00	\$0.00
308 Universal service support revenues received from Federal or state sources	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</i>					
309 Monthly, activation, and message charges except toll	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Toll services</i>					
310 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)	\$0.00	0.00	0.00	\$0.00	\$0.00
311 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)	\$0.00	0.00	0.00	\$0.00	\$0.00
312 Long distance private line services	\$0.00	0.00	0.00	\$0.00	\$0.00
313 Satellite services	\$0.00	0.00	0.00	\$0.00	\$0.00
314 All other long distance services	\$31,361,005.00	18.73	81.27	\$5,874,822.00	\$28,486,183.00
315 Total revenues provided for resale (Lines 303 through 314)	\$31,361,005.00	18.73	81.27	\$5,874,822.00	\$28,486,183.00

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers was a direct contributor to the federal universal service support mechanism for calendar year 2006 and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. The FCC website contains information on federal universal service contributors. (See instructions.)

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Block 4-A: End-User and Non-Telecommunications Revenue Information

401 Filer 499 ID (from Line 101)	028216				
402 Legal name of reporting entity (from Line 102)	Compass Global, Inc.				
Report billed revenues for January 1 through December 31, 2006. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.					
	Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
<b>Revenues from All Other Sources (end-user telecom. &amp; non-telecom.)</b>					
403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions	\$0.00	0.00	0.00	\$0.00	\$0.00
<b>Fixed local services</b>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>traditional circuit switched</i>					
404.1 Provided at a flat rate including interstate toll service -- local portion					
404.2 Provided at a flat rate including interstate toll service -- toll portion	\$0.00	0.00	0.00	\$0.00	\$0.00
404.3 Provided without interstate toll included (see instructions)	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>interconnected VoIP</i>					
404.4 Offered in conjunction with a broadband connection	\$0.00	0.00	0.00	\$0.00	\$0.00
404.5 Offered independent of a broadband connection	\$0.00	0.00	0.00	\$0.00	\$0.00
405 Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer	\$0.00	0.00	0.00	\$0.00	\$0.00
406 Local private line & special access service (Through August 13, 2006, includes the transmission portion of wireline broadband Internet access. After August 13, 2006, includes the transmission portion of wireline broadband Internet access provided on a common carrier basis.)	\$0.00	0.00	0.00	\$0.00	\$0.00
407 Payphone coin revenues (local and long distance)	\$0.00	0.00	0.00	\$0.00	\$0.00
408 Other local telecommunications service revenues	\$0.00	0.00	0.00	\$0.00	\$0.00
<b>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</b>					
409 Monthly and activation charges	\$0.00	0.00	0.00	\$0.00	\$0.00
410 Message charges including roaming and air-time charges for toll calls, but excluding separately stated toll charges	\$0.00	0.00	0.00	\$0.00	\$0.00

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Block 4-A: Continued

Toll services	Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		Interstate	International	Interstate Revenues (d)	International Revenues (e)
411 Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards	\$34,382,061.00	2.0%	97.97	\$697,710.00	\$33,684,351.00
412 International calls that both originate and terminate in foreign points	\$425,078.00	0%	100%		\$425,078.00
413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412	\$0.00	0.00	0.00	\$0.00	\$0.00
Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PLCC pass-through, and other switched services not reported above)					
414.1 All, other than interconnected VoIP, including, but not limited to, itemized toll on wireline and wireless bills	\$0.00	0.00	0.00	\$0.00	\$0.00
414.2 All interconnected VoIP long distance, including, but not limited to, itemized toll	\$0.00	0.00	0.00	\$0.00	\$0.00
415 Long distance private line services	\$0.00	0.00	0.00	\$0.00	\$0.00
416 Satellite services	\$0.00	0.00	0.00	\$0.00	\$0.00
417 All other long distance services	\$0.00	0.00	0.00	\$0.00	\$0.00
Revenues other than U.S. telecommunications revenues, including information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues. (See instructions.)					
418.1 bundled with circuit switched local exchange service	\$0.00				
418.2 bundled with interconnected VoIP local exchange service	\$0.00				
418.3 other	\$0.00				

Block 4-B: Total Revenue and Uncollectible Revenue Information

419 Gross billed revenues from all sources. (incl. reseller & non-telecom.) (Lines 303 through 314 plus Lines 403 through 418)	\$66,169,144.00			\$6,572,532.00	\$59,596,612.00
420 Gross universal service contribution base amounts (Lines 403 through 411 Lines 413 through 417) See Figure 4 in instructions.	\$34,382,061.00			\$697,710.00	\$33,684,351.00
421 Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419 (See instructions Page 25)	\$0.00			\$0.00	\$0.00
422 Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420	\$0.00			\$0.00	\$0.00
423 Net universal service contribution base revenues (Line 420 minus line 422)	\$34,382,061.00			\$697,710.00	\$33,684,351.00

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Block 6: Additional Revenue Breakouts

501 Filer 499 ID (from Line 101)

22216

502 Legal name of reporting entity (from Line 102)

Compass Global, Inc.

Filers that report revenues in Block 3 and Block 4 must provide the percentages requested in Lines 503 through 510. See page 27 of instructions for limited exceptions.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

		Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)
503	Southeast: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands	0 %	0 %
504	Western: Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming	0 %	0 %
505	West Coast: California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island	0 %	0 %
506	Mid-Atlantic: Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia	0 %	0 %
507	Mid-West: Illinois, Indiana, Michigan, Ohio, and Wisconsin	0 %	0 %
508	Northeast: Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont	100 %	100 %
509	Southwest: Arkansas, Kansas, Missouri, Oklahoma, and Texas	0 %	0 %
510	Total [Percentages must add to 0 or 100.]	100 %	100 %

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the Instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

Revenues from resellers that do not contribute to Universal Service	(a)		(b)	
	Total Revenues		Interstate and International	
\$	0	\$	0	0

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**Block 5: CERTIFICATION: to be signed by an officer of the filer**

601 Filer 499 ID [from Line 101]

826216

602 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service

TRS

NANPA

LNP Administration

I certify that the reporting entity is an interconnected VoIP filer became subject to FCC Form 499 filing requirements on or after August 1, 2006 and therefore is reporting revenues in Blocks 3, 4, and 5 for the fourth quarter of 2006 instead of for the entire calendar year.

Provide explanation below:

604 Please indicate whether the reporting entity is

State or Local Government Entity

I.R.C. § 501 Tax Exempt

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity as defined on page 28 of the instructions, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature

First Name: Dean

MI

Last Name: Cary

607 Printed name of officer

CEO

608 Position with reporting entity

(201) 802-0600

ext -

609 Business telephone number of officer

610 Email of officer || Required if available -- not for public release || deancary@compassglobal.net

03/27/2007

611 Date

612 Check those that apply:

Original April 1 filing for year

New filer, registration only

Revised filing with updated registration

Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 208 Washington DC, 20036  
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (888) 641-8722 or via email: Form499@universalservice.org

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Attachment 7

Responses to Questions 7, 8 and 10

Invoicing Entity	Invoice Date	Invoice Amount	Payment Date	Pd Amount	Check # / Bank Wire	Comments / Remarks
1. NANP	1/12/2007	\$ 722.76	4/10/2007	\$ 722.76	Ck# 1466	
Subtotal NANP				\$ 722.76		
2. NECA	11/6/2007	\$ 156,878.49	Open	\$ -		Compass is currently working with the Revenue & Receivables Operations Group (Tecora Sellers/Cheryl Collins) regarding payment via the Extended Payment Option.
Subtotal NECA				\$ -		
3. Neustar (LNP/SOW)	10/31/2006	\$ 3,674.61	4/7/2007	\$ 3,674.61	Bank Wire/ACH	
3. Neustar (LNP/SOW)	11/30/2006	\$ 2,871.80	4/7/2007	\$ 2,871.80	Bank Wire/ACH	
3. Neustar (LNP/SOW)	12/31/2006	\$ 3,002.86	4/7/2007	\$ 3,002.86	Bank Wire/ACH	
3. Neustar (LNP/SOW)	1/31/2007	\$ 3,211.81	4/7/2007	\$ 3,211.81	Bank Wire/ACH	
3. Neustar (LNP/SOW)	2/28/2007	\$ 3,330.07	4/10/2007	\$ 3,330.07	Bank Wire/ACH	
3. Neustar (LNP/SOW)	3/31/2007	\$ 2,664.19	5/15/2007	\$ 2,664.19	Bank Wire/ACH	
3. Neustar (LNP/SOW)	4/30/2007	\$ 3,058.95	6/8/2007	\$ 3,058.95	Bank Wire/ACH	
Subtotal NECA				\$ 21,814.29		
4. USAC	1/22/2007	\$ 39,179.81	2/25/2007	\$ 39,179.81	Bank Wire/ACH	
4. USAC	2/22/2007	\$ 36,275.89	4/10/2007	\$ 36,275.89	Bank Wire/ACH	
4. USAC	3/22/2007	\$ 36,285.89	4/10/2007	\$ 36,285.89	Bank Wire/ACH	
4. USAC	4/20/2007	\$ 18,353.19	5/11/2007	\$ 18,353.19	Bank Wire/ACH	
4. USAC	5/22/2007	\$ 16,615.83	6/11/2007	\$ 16,615.83	Bank Wire/ACH	
Subtotal USAC				\$ 168,524.90		
GRAND TOTAL PAYMENTS THRU JUNE 25, 2007:				\$ 191,061.95		

EXHIBIT F



File

## The CommLaw Group

HELEIN & MARASHLIAN, LLC  
1483 Chain Bridge Road  
Suite 301  
McLean, Virginia 22101

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Re: *Compass Global Inc.*  
FCC File No. EB-06-IH-3060

Dear Messrs. Hendricks and Harkrader:

On behalf of Compass Global Inc. ("Compass"), transmitted herewith is a supplemental response to the May 7, 2007 notice of inquiry of the Investigation and Hearings Division of the Federal Communications Commission's Enforcement Bureau, in connection with File No. EB-06-IH-3060.

On June 29, 2007, Compass filed an initial response to the inquiry wherein it explained that, through the use of its enhanced switching & call management platform, it provides two, distinct service offerings:

- (1) wholesale "IP-in-the-Middle" services offered to other carriers and Enhanced Service Providers, and
- (2) PIN accessible switching platform services sold to unaffiliated companies seeking to private label, distribute or otherwise sell prepaid calling cards.

Compass explained that neither of these services constitutes the provisioning of "telecommunications service" under current laws and regulations. This supplemental response is

intended to clarify Compass' legal position with respect to the proper regulatory treatment of its services.

## I. Background

Compass is a privately held Enhanced Communications Service company headquartered in Woodcliff Lake, NJ. At the end of 2004, Compass revolutionized telecom history by transitioning from a legacy TDM based switching infrastructure to embrace revolutionary next generation technology employing TCP/IP to form the first VoIP Global Enhanced Communications Services Network (GECSN). Compass Global became the first major global carrier to convert one-hundred percent of its network, switches, systems and infrastructure to this newest state-of-the-art technology using TCP/IP over the public internet to process 100% of the calls transiting its global network. All calls received from its customers enter the Compass network via the internet. All calls are then processed and handed off via TCP/IP with VoIP protocols to Compass' terminating carriers located around the world who are reached via the global public IP peering networks. By doing so, Compass Global became the world's first true Global Enhanced Communications Service (GECS) company and established a trend that has become the model for global communications companies.

## II. Compass Global's Enhanced Wholesale Service is not Retail Telecommunications Subject to USF Regulations

Compass' primary business is building and operating international IP voice and data networks between the United States and selected countries in South America, Africa, Asia, and the Middle East. It builds its routes in conjunction with in-country partners who are responsible for operating the foreign portion of the international network. Compass resells this network capacity to the world's major communications companies who transmit their international voice and data calls over this network.

Under applicable Communications law and FCC regulations, Compass' Enhanced Wholesale Service ("EWS") is two things: (1) enhanced/information service and (2) wholesale. What it is not is "telecommunications" or a *retail* telecommunications service.

The 1996 Act defines "telecommunications" as "the transmission, between or among point specified by the user, of information of the user's choosing, without change in form or content of the information as sent and received."<sup>1</sup> Section 3(20) of the Communications Act, 47 U.S.C. § 153(20), provides that an "information service" is the "offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications." The Commission's rules further provide that any service "which employ[s] computer processing applications that act on the format, content, code, protocol or similar aspects of the subscriber's transmitted information, provide the subscriber additional, different, or restructured information, . . . or involve subscriber interaction with stored information" are "enhanced" and therefore "information" services.<sup>2</sup>

<sup>1</sup> 47 U.S.C. § 153(43).

<sup>2</sup> 47 C.F.R. § 64.702(a). See also *Non-Accounting Safeguards Order*, 11 FCC Rcd. 21905, ¶ 102 (1996) (statutory category of "information services" is broader than "enhanced services" but includes everything previously deemed to be enhanced services); *Federal-State Joint Board on Universal Service*, Report to Congress, 13 FCC Rcd. 11501, ¶ 33 (1998) ("*Report to Congress*").

It is without question that Compass' EWS is an information service and not a telecommunications service. First, as shown in the attached network diagram at Attachment 1, Compass' GECSN receives and hands-off communications in Internet Protocol exclusively. Compass does not touch traditional, TDM voice traffic. Second, Compass' GECSN interconnects with the international IP voice and data communications networks of other carriers through peering arrangements, further reflecting the information services nature of the traffic being exchanged. Compass is a true "IP-in-the-Middle" provider.

The Commission's *AT&T IP-in-the-Middle Order* did not result in the re-classification of Compass' information services and did not interpose Title II regulatory obligations, such as Universal Service Fund and access charges. See *Petition for Declaratory Ruling that AT&T's Phone-to-Phone IP Telephony Services are Exempt from Access Charges*, Order, 19 FCC Rcd. 7457 (2004) ("*AT&T IP-in-the-Middle Order*").

In the *AT&T IP-in-the-Middle Order*, the Commission held that AT&T's specific IP-enabled service, even though it transported voice telephone data over IP-enabled lines, was a telecommunications service, not an information service. However, the Commission narrowly applied the holding in the *AT&T IP-in-the-Middle Order* to AT&T's specific retail, end-to-end, IP-enabled service. Unlike AT&T's service, Compass' EWS is not an end-to-end retail service. Indeed, Compass does not sell EWS to the public; customers of EWS are, instead, international carriers, who themselves may not even provide retail services. As earlier described, Compass' GECSN does not handle TDM traffic, since both access and egress to the network is in IP format.

In summation, Compass' EWS is neither "telecommunications" nor is it sold to retail customers. Therefore, for purposes of Form 499 reporting, revenue derived from EWS is properly reported as "information service" or "non-telecommunications." Since September 2006, Compass' agent, Hinton, Kreditor & Gronroos, LLP ("HKG"), mistakenly reported EWS revenue as "wholesale telecommunications" in Form 499s prepared and filed on behalf of Compass. These filings are categorically incorrect. Concurrently with filing this supplemental response, Compass took actions to revise its Form 499-A to correct HKG's mistakes and to reflect proper reporting of its EWS revenue in Line 418. See Attachment 2.

Compass requests the IHD take this supplemental response and its revised Form 499 filings into consideration to ensure proper disposition of the above-captioned file.

### III. Compass Global's PIN-Accessible Prepaid Calling Platform Service is not a "Calling Card Service"

Compass' second line of business is its PIN Accessible Prepaid Calling Platform service ("PIN Platform service"). To provide PIN Platform Services, Compass combines its core IP Network, comprised of Sansay VSX VOIP session border controllers and Cisco 7206 VXR & Cisco AS 5400 gateways, with a NACT IPAX prepaid debit switch. To use the PIN Platform to complete calls, the public purchases prepaid calling cards sold by a variety of Compass' business customers ("Debit Card Providers"), then dial a toll-free or local access number, enter a personal identification number ("PIN"), and dial the destination number. The calling cards sold to the public by Compass' customers, the Debit Card Providers, are not associated with Compass in any manner.

Importantly, Compass does not use its PIN Platform to sell calling card services directly to the public for a fee. Instead Compass sells exclusively to other companies, who in turn sell prepaid calling cards directly to the public or through their own distribution channels. Compass is neither