PTGi

September 20, 2013

BY HAND

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: PTI Telecommunications Quarterly PIU Report for 2nd Quarter 2013,
WC Docket No. 05-68

Dear Secretary Dortch:

On behalf of Primus Telecommunications, Inc. ("PTI"), please find attached a redacted, public version and a confidential version of the Officer Certification required in WC Docket No. 05-68 for 2nd Quarter 2013.

PTI, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§5 0.457, 0.459 (1994), hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. This Certification contains information regarding PTI's calling card traffic patterns and revenue --- information that would not otherwise be available to the public. Due to the confidential nature of such information, PTI hereby requests that the attached confidential Certification be treated as a confidential document not subject to public inspection. Accordingly, the attached Certification of PTI has been marked "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION." PTI provides justification for the confidential treatment of this information in Attachment 1 to this letter. PTI is also submitting, under separate cover, for inclusion in the Commission's public files, a redacted version of this Certification. The redacted version is marked "REDACTED - FOR PUBLIC INSPECTION," with the confidential information redacted.

For both versions of this filing, PTI is providing an original and four copies and, for both versions, an extra copy of each to be stamped and returned to the courier.

Should you have any questions concerning this filing, or the request for confidentiality, please do not hesitate to contact me at (703) 639-4797.

Respectfully submitted,

Andrea L. Mancuso
Acting General Counsel

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

ATTACHMENT 1
Confidentiality Justification

PTI requests confidential treatment of the information being provided in its Pre-Paid Calling Card Provider FCC Quarterly Certification ("Certification") because this information is competitively sensitive and its disclosure would have a negative competitive impact on PTI were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§90.457 and 0.459.

47 C.F.R. 0§.457

Specific information in the Certification is confidential and proprietary to PTI as "trade secrets and commercial or financial information" under Section 47 C.F.R. §0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with PTI' ongoing business and operations.

47 C.F.R. 0. §459

Specific information in the Certification is also subject to protection under 47 C.F.R. §0.459, as demonstrated below.

Information for which confidential treatment is sought

PTI requests that specific information in the Certification, marked as "[REDACTED]" be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential is information regarding PTI' percentage of intrastate, interstate and international calling card minutes. This information is competitively sensitive information that PTI maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on PTI since it would provide competitors with commercially sensitive information. The non-redacted version of PTI' filing is marked as "CONFIDENTIAL - NOT FOR PUBLIC INSPECTION."

Commission proceeding in which the information was submitted

The information is being submitted as PTI' Pre-Paid Calling Provider FCC Quarterly Certification in WC Docket No. 05-68.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged

The information designated as confidential is information regarding PTI' percentage of intrastate, interstate and international calling card minutes. As noted above, the data is competitively sensitive information which is not normally released to the public as such release would have a substantial negative competitive impact on PTI.

Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm

The release of this confidential and proprietary information would cause PTI competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of PTI' business.

Measures taken by PTI to prevent unauthorized disclosure: and availability of the information to the public and extent of any previous disclosures of the information to third parties

PTI has treated and continues to treat the non-public information disclosed in this Certification as confidential and has protected it from public disclosure to parties outside of the company.

Justification of the period during which PTI asserts that the material should not be available for public disclosure

PTI cannot determine at this time any date on which this information should not be considered confidential.

Other information PTI believes may be useful in assessing whether its request for confidentiality should be granted

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

CERTIFICATION OF PTI TELECOMMUNICATIONS, INC.

1. Pursuant to 47 C.F.R. § 64.5001(c), the undersigned hereby certifies that they are an officer of Primus Telecommunications, Inc. ("PTI"); and that to the best of my knowledge, information or belief, all statements of fact contained in this certification are true and that said certification is an accurate statement of the data set forth herein for the reporting period of fourth quarter 2011.

2. The following is the percentage of intrastate, interstate, and international calling card minutes for the above stated reporting period.

a. Percentage of intrastate calling card minutes:
b. Percentage of interstate calling card minutes:
c. Percentage of international calling card minutes: [redacted]

3. The percentage of total prepaid calling card service revenue (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 reporting period is [redacted] percent.

4. PTI is contributing to the required Universal Service Fund based on the reported information, to the extent required by the applicable Commission regulations.

5. PTI has provided the reports required under paragraph (a) of 47 C.F.R. § 64.5001to carriers from which transport services are purchased.

The foregoing certification is made under penalty of perjury of the laws of the Commonwealth of Virginia on this, the 20th day of September, 2013.

SIGNATURE: Andrea L Mancuso

PRINTED NAME: Andrea L. Mancuso

POSITION: Acting General Counsel