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January 25, 2008

Via FedEx

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

**Re: In the Matter of Primus Telecommunications, Inc. and Least Cost Routing, Inc.
Docket Nos. T-03243A-07-0666 and T-03602A-07-0666**

Docket Control:

Enclosed for filing are an original and thirteen (13) copies of the Responses to Staff's First Set of Data Requests in the above-referenced proceedings.

Please date-stamp the enclosed extra copy and return it in the attached self-addressed, postage prepaid envelope provided. Should you have any questions concerning this filing, please do not hesitate to contact Danielle Burt at (202) 373-6039.

Respectfully submitted,

Catherine Wang
Danielle Burt

cc (via FedEx and email): Armando Fimbres, Utilities Division
Janet Wagner, Legal Division

- Boston
- Hartford
- Hong Kong
- London
- Los Angeles
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Arizona Corporation Commission
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**ARIZONA CORPORATION COMMISSION
STAFF'S FIRST SET OF DATA REQUESTS TO
PRIMUS TELECOMMUNICATIONS, INC. ("PTI") AND
LEAST COST ROUTING, INC. ("LCR")
DOCKET NOS. T-03243A-07-0666 AND T-03602A-07-0666**

STF 1.1 How many customers will be impacted by the proposed transfer of customers from LCR to PTI?

Response

Least Cost Routing has approximately 16 customers in Arizona that will be impacted by the proposed transaction.

Respondent

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Danielle Burt, Esq.
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2020 K Street, NW
Washington, DC 20006

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STF 1.2 The above application states in part "LCR's customers will continue to receive the same services that they currently receive without any immediate changes to the service offerings, rates, or terms and conditions..."

Please provide a definition for the word "immediate" in the above statement. For example, what is the earliest date at which rates or services may change?

Response

At this time, PTI has no plans to change the rates or services offered to LCR's customers in Arizona. PTI included a statement in the application that no "immediate" changes to rates or services will occur because PTI may decide at some future date to make changes, although PTI has no plans to do so and therefore cannot estimate a date when rates or services may change. Should PTI decide to change rates or services offered in Arizona at some future date, it will comply with any applicable regulation, including customer notice requirements, set forth by the Federal Communications Commission and the Arizona Corporation Commission.

Respondent

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STF 1.3 The Sample Customer Notice Letter in Exhibit B of the above application states in part "Following the merger, you will continue to enjoy the same high quality service you currently receive from LCR and will continue to receive services with the same rates, features, terms and conditions as the service you currently enjoy."

Please explain how the term in the Sample Customer Notice Letter "...the same rates..." is consistent with the explanation in the application which states "LCR's customers will continue to receive the same services that they currently receive without any *immediate changes* to the service offerings, rates, or terms and conditions." (emphasis added)

Response

The statements in the Sample Customer Notice letter and the application are consistent because at this time, PTI has no plans to change the rates or services offered to LCR's customers in Arizona. Since PTI does not plan at this time to change the rates or services offered, LCR's customers will continue to receive the same services with the same rates, features, terms and conditions when PTI is their service provider.

Respondent

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STF 1.4 The Sample Customer Notice Letter in Exhibit B of the above application states in part "...You will therefore not notice any significant change in the bills that you currently receive for long distance service or in the company's customer service procedures..."

Please explain how customers who transfer from LCR to PTI can expect to pay the "same rates" and also expect to "not notice any significant change in the bills" as stated in the Sample Customer Notice Letter.

Response

As a result of the transfer, LCR's customers can expect to pay the same rates and therefore will not notice any significant change in a bill from PTI. However, the appearance of a bill from PTI may differ slightly from an LCR bill in nonsubstantive ways that do not affect the terms and conditions of service. As an example, the company may decide to include the Primus logo and registered trademark on the invoice.

Respondent

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STF 1.5 The Sample Customer Notice Letter in Exhibit B of the above application states in part "...You should not be charged any carrier-change charges levied by your local telephone company..."

Please explain why PTI should not pay carrier-change charges incurred by LCR customers who transfer to carrier other than PTI.

Response

PTI acknowledges its responsibility to pay any carrier-change charge assessed as a result of the proposed transfer, including a transfer to another carrier. However, as stated in the letter, PTI does not expect customers to be charged any carrier-change charges.

Respondent

Catherine Wang, Esq.
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STF 1.6 Please provide a copy of the legal notice as required by R14-02-1107.B

Response

Attached hereto as Exhibit A is the affidavit of legal notice publication.

Respondent

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Danielle Burt, Esq.
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2020 K Street, NW
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Exhibit A

Affidavit of Publication

THE ARIZONA REPUBLIC

NOTICE OF REQUEST TO CANCEL A CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE RESOLD INTEREXCHANGE TELECOMMUNICATIONS SERVICES IN ARIZONA BY LEAST COST ROUTING, INC.
DOCKET NO. T-03243A-07-0666

Least Cost Routing, Inc. (Applicant) has filed with the Arizona Corporation Commission (Commission) a request to cancel its Certificate of Convenience and Necessity (Certificate) to provide resold interexchange telecommunications services in the State of Arizona as result of a proposed internal reorganization. Applicant provides resold interexchange telecommunications services in Arizona pursuant to the Certificate.

A.A.C. R14-2-1107 provides that the Commission may act on a request to cancel a Certificate without a hearing, once proper notice is effected and if no objection is filed, or with a hearing if one is requested by an interested person. Interested persons have thirty (30) days from the date of publication of this notice to object to the cancellation request, ask for a hearing or to submit a motion to intervene.

The cancellation request, the report of the Commission's Utilities Division Staff, and any written exceptions to the Staff Report prepared by Applicant are, or will be, available for inspection during regular business hours at the offices of the Commission located at the 1200 West Washington Street, Phoenix, Arizona 85007, and at Applicant's office located at 7501 Jones Branch Drive, Suite 900, McLean, Virginia 22102.

Under appropriate circumstances, interested parties may intervene in the proceedings, and participate as a party. Intervention shall be in accordance with A.A.C. R 14-3-105, except that all motions to intervene must be filed on or within thirty (30) days from the date of publication of this notice. You may have the right to intervene in the proceedings, or you may make a statement for the record, if you have any comments, mail them to: The Arizona Corporation Commission Attention Docket Control

Re: Least Cost Routing, Inc.
Docket No. T-03243A-07-0666
1100 West Washington Street
Phoenix, Arizona 85007

If you have any questions about this cancellation request, or have any objections to its approval, you may contact the Consumer Services Section of the Commission at 1100 West Washington Street, Phoenix, Arizona 85007, or call 1-800-222-7000. The Commission does not discriminate on the basis of disability in admission to its public meetings. Persons with a disability may request reasonable accommodations such as sign language interpreter, as well as request this document in an alternative format, by contracting Linda Hogan, ADA Coordinator, voice phone number (602) 542-3931. E-Mail: lhogan@cc.state.az.us. Requests should be made as early as possible to allow time to arrange the accommodation.
Pub: January 4, 2008

STATE OF ARIZONA }
COUNTY OF MARICOPA } SS.

Robert Lane, being first duly sworn, upon oath deposes and says: That he is a legal advertising representative of the Arizona Business Gazette, a newspaper of general circulation in the county of Maricopa, State of Arizona, published at Phoenix, Arizona, by Phoenix Newspapers Inc., which also publishes The Arizona Republic, and that the copy hereto attached is a true copy of the advertisement published in the said paper on the dates as indicated.

The Arizona Republic

January 4, 2008

Sworn to before me this
4TH day of
January A.D. 2008

MARYLIN GREENWOOD
Notary Public - Arizona
Maricopa County
My Comm. Expires May 23, 2011

Notary Public