

Suite 800
1919 Pennsylvania Avenue NW
Washington, DC 20006-3401

Adam Shoemaker
202.973.4222 phone
202.973.4499 fax

adamshoemaker@dwt.com

June 18, 2013

VIA ELECTRONIC FILING

Adrienne Downs
International Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notification of Pro Forma Assignment

Dear Ms. Downs:

Please find enclosed revised responses to the following items in the Notification of Pro Forma Assignment filed by Primus Telecommunications, Inc. on June 10, 2013:

- Revised Item 4
- Revised Item 5
- Revised Item 9
- Revised Item 10
- Revised Item 11
- Revised Item 13

If you have any questions, please do not hesitate to contact me.

Sincerely,

Davis Wright Tremaine LLP

/s/ Adam Shoemaker

Adam Shoemaker
Counsel for Primus Telecommunications, Inc.

REVISED RESPONSES

Answer to Question 4: File Numbers of Section 214 Authorities for Which You Seek Consent to Assign or Transfer Control

ITC-214-19960705-00299

ITC-214-19960215-00015

ITC-214-19951015-00041

Answer to Question 5: Name of Section 214 Authorization Holder

Primus Telecommunications, Inc.
460 Herndon Parkway
Suite 150
Herndon, VA 20170
Tel: (703) 639-4840
Attention: Andrea Mancuso
E-mail: amancuso@ptgi.com

Answer to Question 9: Description

Pro forma assignment of wholesale telecommunication customer contracts from Primus Telecommunications, Inc. to PTGi International Carrier Services, Inc., closed on May 9, 2013. Assignor International 214 numbers ITC-214-19960705-00299, ITC-214-19960215-00015, and ITC-214-19951015-00041.

Answer to Question 10: Contact Information and Prior 214 Authorization

The name, title, post office address, and telephone number of the officer and any other contact point, such as legal counsel, to whom correspondence concerning the application is to be addressed

Assignor
James C. Keeley
460 Herndon Parkway
Suite 150
Herndon, VA 20170
Tel: (703) 639-4840

With copies to
Andrea Mancuso
460 Herndon Parkway
Suite 150
Herndon, VA 20170
Tel: (703) 639-4797

Revised Responses in Notification of Pro Forma Assignment of Customer Base by Primus Telecommunications, Inc.

Fax: (703) 902-2814

Fax: (703) 650-4295
amancuso@ptgi.com

Assignee

John Filipowicz
460 Herndon Parkway
Suite 150
Herndon, VA 20170
Tel: (703) 639-4840
Fax: (703) 902-2814

With copies to

Andrea Mancuso
460 Herndon Parkway
Suite 150
Herndon, VA 20170
Tel: (703) 639-4797
Fax: (703) 650-4295
amancuso@ptgi.com

A statement as to whether the applicant has previously received authority under Section 214 of the Act and, if so, a general description of the categories of facilities and services authorized (i.e., authorized to provide international switched services on a facilities basis)

Applicant/assignor holds domestic and international Section 214 authority. It has international authorizations under file numbers ITC-214-19960705-00299, ITC-214-19960215-00015, and ITC-214-19951015-00041. Assignor is a facilities-based carrier and an international resale carrier that sells wholesale telecommunications services to business customers.

Assignee holds domestic and international Section 214 authorization. It has international authorization under file numbers ITC-214-20080131-00042. Assignee is a facilities-based carrier and an international resale carrier that sells wholesale telecommunications services to business customers.

Answer to Question 11: 10% or Greater Equity Holders of Assignee

The Assignee, PTGi International Carriers Services, Inc. ("PTGi ICS") is a Delaware corporation whose address is 460 Herndon Parkway, Suite 150, Herndon, Virginia 20170. Assignee's principle business is providing wholesale telecommunications services to business customers. Assignee is 100% owned by Arbinet Corporation (a Delaware corporation), which is in turn 100% owned by Primus Telecommunications Holding, Inc., (a Delaware corporation), which itself is 100% owned by Primus Telecommunications Group, Incorporated (a Delaware corporation). Karen Singer holds a 12% interest in Primus Telecommunications Group, Incorporated. No other person or entity holds a 10% or greater interest in Primus Telecommunications Group, Incorporated.

The Assignor, Primus Telecommunications, Inc., is a Delaware corporation whose address is 460 Herndon Parkway, Suite 150, Herndon, Virginia 20170. Assignor's principle business is providing wholesale telecommunications services to business customers. Assignor is 100% owned by Primus Telecommunications Holding, Inc. (a Delaware corporation), which is in turn

Revised Responses in Notification of Pro Forma Assignment of Customer Base by Primus Telecommunications, Inc.

100% owned by Primus Telecommunications Group, Incorporated (a Delaware corporation). Karen Singer holds a 12% interest in Primus Telecommunications Group, Incorporated. No other person or entity holds a 10% or greater interest in Primus Telecommunications Group, Incorporated.

Answer to Question 13: Description of the Transaction

Assignor assigned the entirety of its wholesale telecommunications carrier customer contracts to assignee in a transaction that closed on May 9, 2013. Assignor will keep its 214 licenses, and will continue to provide services. Assignor is in the process of being sold, and this assignment was completed in anticipation of that transaction. *See Domestic Section 214 Application Filed for the Transfer of Control of Primus Telecommunications, Inc. to PTUS, Inc.*, Public Notice, DA 13-1368, WC Docket No. 13-145 (June 14, 2013).