

Catherine Wang  
Danielle Burt  
Katie Besha  
Phone: 202.373.6000  
Fax: 202.373.6001  
catherine.wang@bingham.com  
danielle.burt@bingham.com  
katie.besha@bingham.com

June 2, 2009

**Via ECFS and IBFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
c/o Natek, Inc.  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, DC 20002

**Re: WC Docket No. 09-75 and File Nos. ITC-T/C-20090515-00224, ITC-T/C-20090515-00226, and ITC-T/C-20090515-00227**  
**SUPPLEMENT**

Dear Ms. Dortch:

Primus Telecommunications, Inc. (“PTI”), Least Cost Routing, Inc. (“LCR”), The St. Thomas and San Juan Telephone Company, Inc. (“STSJ Telephone”), and STSJ Overseas Telephone Company, Inc. (“STSJ Overseas”) (collectively, “Licensees”) along with their ultimate parent company, Primus Telecommunications Group, Incorporated, Debtor-in-Possession (“PTGI”; and collectively with Licensees referred to as “Applicants”), hereby supplement the Application in the above-referenced proceedings.<sup>1</sup>

Applicants disclosed that they expected one entity, Southpaw Asset Management Fund LP, may obtain an 11.4% equity interest in PTGI as a result of the proposed Plan of Reorganization (“Plan”) that was filed with the United States Bankruptcy Court for the

---

<sup>1</sup> Applicants filed an Application on May 18, 2009, which has been docketed as WC Docket No. 09-75 and File Nos. ITC-T/C-20090515-00224, ITC-T/C-20090515-00226, and ITC-T/C-20090515-00227 (the “Application”). In addition to the Application, PTGI and its subsidiary, Interisland Telephone Corporation (“Interisland”), submitted an application on May 19, 2009, requesting consent for the transfer of control of the wireless licenses held by Interisland. *See* File No. 0003840311.

Boston  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Washington

Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806

T 202.373.6000  
F 202.373.6001  
bingham.com

A/73054648.1

District of Delaware (“Bankruptcy Court”).<sup>2</sup> Applicants have since determined that, as a result of certain dispositions, Southpaw Asset Management Fund LP, which is ultimately controlled by U.S. citizens, will not obtain a 10% or greater interest in PTGI. As a result, it is expected that reorganized PTGI’s equity will be held by diverse and unaffiliated entities following consummation of the Plan, such that no entity is expected to hold legal majority control or actual working control of PTGI’s voting stock and no entity is expected to hold a 10% or greater interest of PTGI’s equity. Applicants agree to notify the Commission within 30 days of the completion of the reorganization as to the final ownership interests, including any individual or entity that has shares constituting 10% or more of the equity or voting interests in PTGI.

Should you have any questions or require further information, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink that reads "Danielle Burt". The signature is written in a cursive, flowing style.

Catherine Wang  
Danielle Burt  
Katie Besha

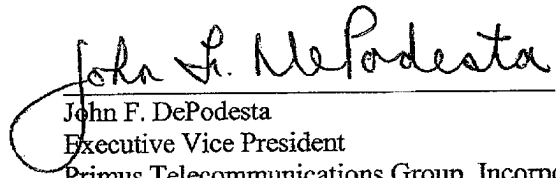
---

<sup>2</sup> See *Primus Telecommunications Group Incorporated, et. al.*, Debtors, Case Nos. 09-10867 (KG) through 09-10970 (KG), U.S. Bankruptcy Court (DE filed Mar. 16, 2009).

**Verification**

I, John F. DePodesta, state that I am Executive Vice President of Primus Telecommunications Group, Incorporated, the ultimate parent of Primus Telecommunications, Inc., Least Cost Routing, Inc., The St. Thomas and San Juan Telephone Company, Inc., and STSJ Overseas Telephone Company, Inc.; that the foregoing filing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2<sup>nd</sup> day of June, 2009.

  
\_\_\_\_\_  
John F. DePodesta  
Executive Vice President  
Primus Telecommunications Group, Incorporated