
July 16, 2014

Mr. John Carlin
Assistant Attorney General
National Security Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Re: PTUS, Inc. Letter of Assurance
Transfer of Control of Primus Telecommunications, Inc.
FCC Docket No. 13-145

Dear Mr. Carlin:

This letter outlines the commitments made by PTUS, Inc., (“PTUS”) to the U.S. Department of Justice (“DOJ”) in order to address national security, law enforcement and public safety concerns raised with regard to the Company’s application to the Federal Communications Commission (“FCC”) for authority pursuant to Section 214 of the Communications Act of 1934, as amended, for the transfer of control of Primus Telecommunications, Inc. (“PTI”), the holder of certain FCC domestic and international Section 214 authorizations, from Primus Telecommunications Group, Incorporated, to PTUS.

Following its acquisition of control of PTI, PTUS agrees that, for all customer billing records, subscriber information, or any other related information used, processed, or maintained in the ordinary course of business relating to communications services offered by PTI to U.S. persons (“U.S. Records”), PTI will make such U.S. Records available in the United States in response to lawful U.S. process. PTUS also agrees that PTI will maintain a point of contact (“POC”) in the U.S., preferably a U.S. citizen, to receive service of process of U.S. Records and to assist and support lawful requests for surveillance by U.S. federal, state and local law enforcement agencies. The name and contact information for this POC will be provided to DOJ for review and approval no later than 30 days after PTUS takes control of PTI. In addition, PTUS will give DOJ at least 30 days’ prior notice of any change to its POC, and PTUS’s newly designated POC shall be subject to DOJ review and approval.

PTUS also agrees that PTI will provide at least 30 days prior notice to the extent that, following the change in control to PTUS, PTI may in the future expand its services beyond the resold 1+ local and long distance services, domestic and international postpaid and prepaid calling card services, and Internet access services described in its response to the DOJ’s Triage Questions on August 12, 2013. Upon becoming a facilities-based provider of interconnected VoIP or other services, PTI will comply with all applicable interception statutes, regulations, and requirements, including the Communications for Law Enforcement Act (“CALEA”) and its implementing regulations, and will comply with all court orders and other legal process for lawfully authorized electronic surveillance.

July 16, 2014

Page 2

PTUS understands that, upon execution of this letter by authorized representatives for PTUS, DOJ shall promptly notify the FCC that it has no objection to the FCC's grant of the above-referenced applications.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glen Gordon", with a long, sweeping horizontal stroke extending to the right.

Glen Gordon