

FILED

APR - 7 2011

iNetworks Group, Inc

Missouri Public  
Service Commission

## Company Name

(Provide the full name of the company as certificated or registered with the Missouri Public Service Commission. Do not abbreviate; include any Commission approved d/b/a or fictitious name, if applicable.)

**TELECOMMUNICATIONS COMPANY OR IVOLP PROVIDER  
ANNUAL REPORT  
TO THE  
MISSOURI PUBLIC SERVICE COMMISSION**

For the Calendar Year of  
January 1 - December 31, 2010

Please select how the company is certificated or registered with the Commission under the Company Name as shown above (check all that apply):

- ☐ Incumbent Local Telecommunications Company (not competitively classified ILEC)
- ☐ Incumbent Local Exchange Telecommunications Company (competitively classified ILEC)
- ☒ Competitive Local Exchange Telecommunications Company (CLEC)
- ☐ Interexchange Telecommunications Company (IXC)
- ☐ Local Non-switched Telecommunications Provider (classified in EFIS as IXC )
- ☐ Interconnected Voice over Internet Protocol Service Provider (IVoIP)

If more than one certificate or registration is held by the company then keep in mind that you must file an annual report in the Commission's Electronic Filing and Information System (EFIS) based on each certificate or registration. In such situations, we anticipate the annual reports to be identical; however please verify the following:

- ☐ The various annual reports filed in EFIS are identical.
- ☐ The various annual reports filed in EFIS are different.
- ☒ Not applicable (Company only has one certificate or registration; therefore only one annual report was filed in EFIS.)

Please choose one of the following filing options to indicate the security level of the filing:

- ☒ Public submission (NOT Proprietary or Highly Confidential)
- ☐ Non-Public submission (Highly Confidential or Proprietary)  
(See instructions for special requirements.)

Please review the instructions document before proceeding by using the link below:

[Instructions - 2010 Annual Report Telco and IVoIP](#)

**1. State in full the company's information below:**

<u>125 S. Wacker Dr.</u>			<u>312-212-0822</u>
Company Street Address			Telephone Number
<u>Suite 2510</u>			<u>312-422-9201</u>
Company Mailing Address			Fax Number
<u>Chicago</u>	<u>IL</u>	<u>60606</u>	<u>regulatory@ingts.com</u>
City	State	Zip	E-Mail Address

**2. This company is currently a (check appropriate box):**

☒ Corporation      ☐ Sole Proprietorship      ☐ LP  
☐ Partnership      ☐ LLC      ☐ Other - Explain

**3. Annual Report Contact Information:**

List the contact information of the person completing the form, whether an employee or a third-party preparer. This may differ from the address in Item No. 1.

<u>Agnes Rivera</u>			<u>312-212-0828</u>
Name			Telephone Number
<u>125 S. Wacker Dr., Suite 2510</u>			<u>312-422-9201</u>
Street Address			Fax Number
<u></u>			<u>arivera@ingts.com</u>
Mailing Address			E-mail Address
<u>Chicago</u>	<u>IL</u>	<u>60606</u>	
City	State	Zip	

**4. Identify the principal or general officers of the company at the end of the year.** Please include an additional sheet, if enough space is not provided on this page, to completely provide the requested information.

<u>Title of General Officer</u>	<u>Name of Person Holding Office</u>
<u>President and CEO</u>	<u>David J. Smat</u>
<u>Vice President</u>	<u>Raymonc Cowley</u>
<u></u>	<u></u>
<u></u>	<u></u>

**5. Please provide a list of all mergers, consolidations, and reorganizations involving the registered or certificated company and completed during the last year.** Do not include internal company reorganizations or personnel issues.

none

## 6. Please provide the following information concerning the company's revenues for this calendar year:

Row	Revenues:	MO Jurisdictional (Column A)	Total Company <sup>1</sup> (Column B)
<b>I. RETAIL</b>			
1.	<b>Local Service Revenues</b> include tariffed revenues attributed to local telecommunications services, extended area service, secondary features such as call forwarding, caller ID, local operator services, directory-related services, etc. and for IVoIP service.		\$470,348.19
2.	<b>Interexchange Revenues</b> include revenues attributed to interexchange telecommunications services such as toll services, 800 services, interexchange operator services and interexchange IVoIP services.		\$329.76
3.	<b>Non-Switched Telecommunications Service Revenues</b> include revenues attributed to retail local and interexchange private line services (but not special access or private line services provided to other telecommunications carriers).		\$10,230,790.51
4.	<b>Bundled or Packaged Revenues</b> include any revenues whereby the company is providing voice services in combination with multiple services whereby revenue can not be easily attributed to local, interexchange or non-switched categories. If such bundles includes Internet, video or some non-regulated service then the company's revenue shall be based on the company's rate offer for solely voice services. The excess revenue associated with the bundled service which is over the amount related to revenue associated with voice only service shall be recorded in the Total Company column. If voice service is only offered as part of a bundled service, the company shall identify all revenue associated with the bundle of services in the Missouri Jurisdictional column.		\$48,045.54
5.	<b>Retail Uncollectible Revenues</b> from telecommunications revenues. (This amount is generally a negative number.)		
6.	<b>RETAIL TOTAL</b> (This amount should equal the total of Rows 1 - 5 above and should also match your Missouri Universal Service Fund Net Jurisdictional Revenue Report amount)		\$10,749,514.00
<b>II. OTHER</b>			
7.	<b>Wholesale Revenues</b> include intrastate switched, special access service revenues, carrier billing and collection revenues, and any other revenues derived from other telecommunications carriers.	\$ 101,435.73	\$11,171,441.31
8.	<b>Miscellaneous Revenues<sup>2</sup> associated with non-retail services</b> , such as, advertising revenues, rent revenues, corporate operations revenues, special billing arrangements, customer operations, plant operations, other incidental regulated revenues, and other revenue settlements. <b>NOTE FOR ILEC ONLY:</b> refer to FCC account #s: 5230, 5240, 5250, 5261, 5262, 5263, 5264, 5269, and 5270.)		
9.	<b>Other Uncollectible Revenues</b> from other revenues. (This amount is generally a negative number.)		
10.	<b>High-Cost Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the High-Cost program.	N/A	\$0.00
11.	<b>Other Federal USF Revenues</b> include all revenues received as support from the Universal Service Fund for the following programs: Low Income, Schools and Libraries, and Rural Health.	N/A	\$0.00
12.	<b>State USF Revenues</b> include all revenues received as support from the Universal Service Fund.		\$0.00
13.	<b>TOTAL REVENUES</b> (This amount should equal the total of Rows 6 - 12 above.) Total MO Jurisdictional Revenue (Column A) should match Total Gross Intrastat Operating Revenue on the Statement of Revenue.	\$ 101,435.73	\$21,920,955.31

"Telecommunications Service" as defined by Missouri Revised Statutes Section 386.020(54).

"Interconnected Voice over Internet Protocol service" as defined by Section 386.020(23) RSMo.

<sup>1</sup> List total regulated revenue and IVoIP revenue provided by a registered company and, if applicable, non-regulated revenue for company name as listed at the top of this page. (This form may be submitted by an affiliate, but a separate form must be completed by each certificated or registered entity. Do not include revenues for any company NOT listed at the top of the page.

<sup>2</sup> If you have miscellaneous revenue related to retail telecommunications services, then enter it in Row 1.

**Low Income and Disabled Universal Service Fund Subscriber Quantities**

7. Do you offer basic local telecommunications service or IVolP service as listed under 386.020 RSMo.?

☐ Yes

☒ No

If yes, please quantify the number of low income and disabled subscribers as reported to USAC (federal support, Form 497) and to the Missouri Universal Service Fund administrator for the past calendar year. (Insert "0"s if you do not have such subscribers.)

	**	Number of Missouri Low Income Subscribers	Number of Missouri Disabled Subscribers	**
January				
February				
March				
April				
May				
June				
July				
August				
September				
October				
November				
December				
<b>TOTAL:</b>				

For use when filing under seal.

### Line Quantities for Local Voice Service & IVoIP Service<sup>1</sup>

Exchange <sup>2</sup>	Retail												Wholesale to Non-Registered Nomadic IVoIP Providers <sup>5</sup>			
	Residential						Business									
	**	Facility-based <sup>3</sup>	**	**	Resale/UNE <sup>4</sup>	**	**	Facility-based <sup>3</sup>	**	**	Resale/UNE <sup>4</sup>	**			**	
		0			0			0			0			0		
No Retail Local Voice Provided in 2010																

<sup>1</sup> See instructions for additional clarification about filling out this page.

<sup>2</sup> Exchange refers to areas as listed in ILEC tariffs. (Exchanges are not always the same as rate centers, wire centers and central offices.)

<sup>3</sup> **Facility-based** refers to lines served whereby your company or an affiliate owns the switch and/or local loop.

<sup>4</sup> Resale/UNE refers to lines served whereby your company leases all switch and loop facilities from a non-affiliated carrier either through an agreement or a discounted tariffed rate.

<sup>5</sup> **Wholesale to Non-registered Nomadic VoIP Providers** refers to arrangements where your company is providing wholesale services for a nomadic VoIP provider who is not registered with the Missouri PSC. (Do not use this column for retail line quantities or if your company sets the end user's rates.)

For use when filing under seal.

**Relay Missouri Annual Billing, Collections and Retention**

9. Do you offer basic local telecommunications service or IVoIP service as listed under 386.020 RSMo.?

☐ Yes☒ No

If yes, complete the following:

Month	Relay Missouri Revenue Collected (collected or received, according to your record-keeping methods)		Relay Missouri Retention Amount (of the amount collected)		Relay Missouri Revenue Remitted to Commission (of the amount collected)	
	**	**	**	**	**	**
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						
Total						

10. Please indicate the per line value of the Relay Missouri Surcharge you charge your customers each month.

\$ 0.00

11. If your firm did not impose the Relay Missouri Surcharge, please explain:

No retail local voice services provided in 2010.


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For use when filing under seal.

## Annual Customer Proprietary Network Information (CPNI) Compliance Certificate

(A copy of a company's FCC CPNI filing will suffice for the required descriptions for all items, unless H.2 is chosen, then an additional description must be attached.)

12. The company affirms having established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160(7).

Indicate which of the following apply with Y (Yes) or N (No).

☒

A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. Attached is a brief description of the company's system.

☒

B. The company has implemented personnel training as to when personnel are or are not authorized to use CPNI including an express disciplinary process. Attached is a brief description of the company's training and disciplinary process.

☒

C. The company maintains records for at least one year of sales and marketing campaigns of its own, its agents, affiliates, joint venture partners and any independent contractors, that use its customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. Attached is a brief description of the company's record maintenance system.

☒

D. The company has a supervisory review process for outbound marketing situations. Attached is a brief description of the company's review process.

☒

E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly. Attached is a brief description of the company's procedures.

F. Actions Taken - Select one of the options below:

☒

1. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

☐

2. The company has taken actions against an individual or entity that unlawfully obtains, uses, discloses or sells CPNI, a description of which is attached.

G. Complaints Received - Select one of the options below:

☒

1. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

☐

2. The company has received customer complaints in the past year concerning the unauthorized release of CPNI, a summary of which is attached.

H. Sharing CPNI Information - Select one of the options from below:

☒

1. The company does not share CPNI with joint venture partners or independent contractors (except for billing and collection services)

☐

2. The company obtains OPT-IN approval from customers before disclosing a customer's CPNI to its joint venture partners or independent contractors (except for billing and collection services). The company enters into confidentiality agreements that comply with 4 CSR 240-33.160(3)(A)3 if the company shares CPNI with agents, affiliates, joint venture partners, or independent contractors. Attached is a description of how the agreements comply with MoPSC rules for sharing information with such entities.

For use when filing under seal.

Annual Report of iNetworks Group, Inc

for the calendar year of January 1 - December 31, 2010

**VERIFICATION**

The foregoing report must be verified by the oath of the President, Treasurer, General Manager or Receiver of the company. The oath required may be taken before any person authorized to administer an oath (Notary Public) by the laws of the State in which the same is taken.

**OATH**

State Of Illinois }  
 County Of Cook } ss:

David J. Smat makes oath and says that  
 Name of Affiant (Company Official/Representative)

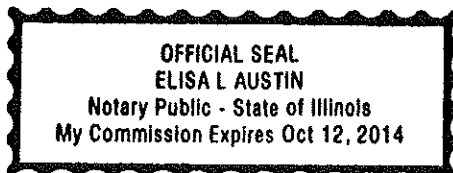
s/he is President & CEO  
 Official Title of the Affiant (Company Official/Representative)

of iNetworks Group, Inc  
 Exact Legal Title or Name of the Respondent (Certificated Company Name)

and is located at 125 S. Wacker Dr., Suite 2510, Chicago, IL 60606 / 312-212-0822  
 Address and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, 2) examined (and updated as applicable) the company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct, and 3) read the CPNI Certification, chosen the applicable alternatives and attached all required documentation, which is a true and correct description of the company's CPNI safeguards.

from January 1, 2010, to and including December 31, 2010  
 Month/Day Year Month/Day Year



[Signature]  
 Signature of Affiant (Company Official/Representative)

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 5th day of April, 2011.

My Commission expires October 12, 2014.

[Signature]  
 Signature of Notary Public



# ***i*NETWORKS**

## **Group**

125 S. Wacker Drive, Suite 2510  
Chicago, IL 60606  
312-212-0822

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### ELECTRONIC FILING

February 7, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445-12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

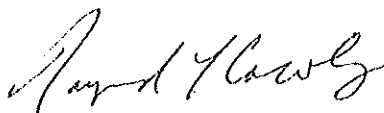
**RE: EB Docket No. 06-36  
Annual 47 C.F.R. § 64.2010(e) CPNI Certification for 2010  
iNetworks Group, Inc. Form 499 Filer ID 823740**

Dear Ms. Dortch:

Herewith transmitted, on behalf of iNetworks Group, Inc., is its 2010 CPNI Certification and Accompanying Statement for filing in the above-referenced docket.

In the even there are any questions in connection with this filing, please communicate with the undersigned.

Very truly yours,



Raymond Cowley  
Senior Vice President and General Manager  
iNetworks Group, Inc.

COPY

Annual 47 C.F.R. § 2011 CPNI Certification

EB Docket 06-36

Annual § 64.2009(e) Certification for 2010

Date Filed: February 7, 2011

Name of company covered by this certification: iNetworks Group, Inc.

Form 499 Filer ID: 823740

Name of signatory: Ray Cowley

Title of signatory: Senior Vice President and General Manager

I, Ray Cowley, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with this Commission's CPNI rules.

See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.*

The company has not taken any actions (i.e. proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the FCC) against data brokers in the past year.

The company has received no customer complaints sin the past year concerning the unauthorized release of CPNI.

Signed: Ray Cowley

Ray Cowley  
Senior Vice President and General Manager  
iNetworks Group, Inc.

### Statement Accompanying CPNI Certification

iNetworks Group, Inc. ("iNetworks") hereby explains how its procedures comply with the requirements set forth in Section 64,2001 *et seq.* of the FCC's Rules.

iNetworks provides two types of services to its customers. First, iNetworks is a Virtual Network Provider providing resold private line data circuits to its customers, having purchased those circuits from telecommunications carriers, such as Verizon, on a wholesale basis. iNetworks has no information about the data transmitted on the circuits it supplies. Accordingly, in connection with this service iNetworks does not collect and thus does not possess any of the information defined as Customer Proprietary Network Information ("CPNI") in Section 222(f) of the Communications Act beyond the points connected by the data circuits iNetworks resells.

Second, iNetworks offers a different type of service, which does involve some exposure to CPNI, and has taken the appropriate measures to protect that CPNI from unlawful disclosure. In 2008, iNetworks entered into a contract with Level 3 Communications LLC ("Level 3") to provide Primary Rate Interface ("PRI"), voice services to Level 3. Level 3 resells those services to Harris Corporation, which is selling the services to the United States Census Bureau in support of the 2010 Decennial Census. iNetworks, in turn, purchases those services from other telecommunications suppliers and reselling them to Level 3.

iNetworks receives invoices from its suppliers. Those invoices sometimes contain individually attributable call detail and other information constituting CPNI, which iNetworks passes along to Level 3.

iNetworks has instituted policies designed to protect the confidentiality of that CPNI. All members of the iNetworks staff who may be exposed to the CPNI in the invoices have been instructed that CPNI is confidential and is not to be shared with anyone outside iNetworks, except Level 3 in the normal course of business.

iNetworks has verified that both its suppliers as well as Level 3 have in place acceptable policies for safeguarding CPNI. iNetworks also provides PRI to an additional business customer in Chicago, IL. However, that service does not result in any CPNI being provided to iNetworks, as all invoices are sent directly to the business customer which pays their own long distance charges. Local service included within the "package" which iNetworks provides and no CPNI is generated.

The CPNI referred to above in connection with the Level 3 Contract is not used for any type of marketing. It is not be disclosed by telephone to anyone, because iNetworks does not have a "carrier-customer" relationship with any of the persons to whom the CPNI belongs. Thus, iNetworks has no need of a password protection or other policy for verifying customer inquiries. Similarly, iNetworks' policy does not include provisions for regulating access to CPNI in person at retail outlets because iNetworks has no retail outlets within the meaning of the CPNI rules.

iNetworks' employees have been warned that inappropriate disclosure of CPNI can subject iNetworks to legal penalties that may include substantial monetary fines. Employees

involved in any misuse or inappropriate disclosure of this information would be subject to disciplinary action, including termination from employment.

Supervisors or employees aware of any such misuse or inappropriate disclosure of CPNI must report that knowledge to iNetworks' Senior Vice President and General Manager.

iNetworks also maintains other information necessary to bill its own customers on a monthly, flat rate basis. Such billing information is maintained in password-protected shared drive computer programs. Only employees with a need to do so are granted access to billing information. Finally, iNetworks instructs all its employees on the need to maintain the confidentiality of all corporate information, including billing information.

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