

Annual CPNI Compliance Certificate

Name of company covered by this certification: STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP

Date: 4/22/2010

I, Susan Cockerham, certify that I am the Attorney In Fact for the company named above, and in my capacity have personal knowledge that the company has 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).

- 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. *[Explain the company's system.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not provide and/or use CPNI for marketing purposes. In the event STi decides to use CPNI for marketing purposes, customer records will be marked clearly as to whether permission for use or disclosure of customer information for marketing of communications related services has been granted. For customers whose records are not marked showing permission has been granted, STi employees will assume permission has not been granted.

- B. The company has implemented personnel training as to when they are and are not authorized to use CPNI including an express disciplinary process. *[Briefly explain the company's training and disciplinary process.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP provides training to all new employees on policy and procedure with regard to the protection and appropriate access and use of CPNI. Employees involved in misuse or inappropriate disclosure of customer information are subject to employee disciplinary action, including possible termination from employment.

- C. The company maintains records for at least one year of their own, their agents' their affiliates', their joint venture partners' or their independent contractors' sales and marketing campaigns that use their 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. *[Briefly explain how such records are maintained.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP has not campaigned products or services that use CPNI. In the event STi decides to use CPNI for marketing campaigns, upon completion of such a marketing campaign, or at regular intervals during the campaign, the appropriate supervisor will review the campaign to ensure the use of customer information is in accord with STi's policy for safeguarding CPNI. Copies of such evaluations will be sent to regulatory personnel for maintenance in the record of the campaign.

- D. The company has a supervisory review process for outbound marketing situations. *[Explain the company's process.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not use customer information for marketing purposes. In the event STi decides to use CPNI for marketing purposes, STi has developed a supervisory review process. Before a supervisor may authorize employees to use customer information for marketing purposes, the proposed use of customer information must be reviewed and approved by regulatory personnel to assure the proposed use conforms with STi's policy for safeguarding CPNI and applicable federal regulations. Records of these reviews, including a description of the campaign, the specific customer information used in the campaign,

and what products and services were offered as part of the campaign, will be maintained by regulatory personnel.

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. *[Explain the company's procedures.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP offers prepaid calling card and casual calling services (e.g. 10-10 dial-around services). STi does not know the identity or address of the end users of the services it provides. STi does not use customer information for marketing purposes. In any instance in which the opt-out mechanism for customer approval for use of customer information in marketing does not work properly to such a degree that customers' inability to opt-out is more than an anomaly, the appropriate supervisor immediately will notify regulatory personnel, who will provide the required notification to the Federal Communications Commission.

F. The company has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI. *[If the company has taken such action, please explain the action.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP has not taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

G. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. *[If the company has received complaints, provide a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.]*

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP offers prepaid calling card and casual calling services (e.g. 10-10 dial-around services). STi does not know the identity or address of the end users of the services it provides. STi has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

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

STi Prepaid, LLC ("STi") d/b/a Telco Group, Telco, TGI, Dialaround Enterprises, Dialaround, DEI, VOIP Enterprises, and VOIP does not share CPNI with joint venture partners or independent contractors.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**


Annual Customer Proprietary Network)
Information Certification pursuant to)
Missouri PSC rule 4 CSR 240-33.160(7))

Filing No. BCPN-2010-

AFFIDAVIT OF SUSAN COCKERHAM

STATE OF GEORGIA)
) ss:
COUNTY OF DOUGLAS)

Susan Cockerham, Attorney In Fact, being of lawful age and after being duly sworn, states that he has participated in preparing the accompanying CPNI compliance certificate and that the facts therein are true and correct to the best of his knowledge and belief.



Susan Cockerham
Attorney In Fact
(770) 956-7525 Ext. 1291
Susan.duggan@thomsonreuters.com

Subscribed and affirmed before me this 22ND day of April 2010
I am commissioned as a notary public within the County of Douglas,
State of Georgia and my commission expires on MAY 6, 2012





NOTARY PUBLIC



Drawer: 0000000004
Company: T_Dialaround Enterprises ME
Entity ID: 014110
Entity Name: T_STI Prepaid LLC
Return Code: P_MO_AR
Return Description: MISSOURI PUC CLEC/IXC ANNUAL REPORT Apr15-6
Due Date: 7
Year: 2010
Month: 3
Sequence Number: 1
Indexed Time: 04/21/2010 11:06:55 AM
Printed By: Susan Duggan
Printed Time: 04/22/2010 12:33:33 PM

STi Prepaid , LLC
c/o Thomson RIA / Tax Partners
3100 Cumberland Boulevard, Suite 900
Atlanta, GA 30339
770-956-7525

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360