

Austin Cleveland Columbus Dallas Dayton Irvine Los Angeles Sacramento founded 1843

1801 K Street, N.W., Suite 400K Washington, D.C. 20006-1301

> telephone 202.775.7100 facsimile 202.857.0172

> > July 12, 2000

Ms. Blanco S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

000850-TI

(1)	Certification Application
	Enhanced Global Convergence Services Inc. d/b/a eGCS
(2)	Request for Confidential Treatment of Financial Exhibit
	<ul><li>(1)</li><li>(2)</li></ul>

Dear Ms. Bayo:

Via Federal Express

Enclosed please find an original and five (5) copies of a certification application (long distance / prepaid debit cards) for the above-referenced company. Also enclosed is a \$250 check for the filing fee.

Pursuant to Florida Statutes Secs. 364.18 and 364.183, confidential treatment is respectfully requested for the financial statements furnished to support the application. This detailed financial information (Exhibit 3) would not normally be made available to competitors, and its public disclosure would provide an unfair advantage to competitors, who could analyze the company's revenues and expenses. Consequently, one copy of Exhibit 3 is provided in a sealed envelope marked "confidential."

An extra copy of this letter is enclosed, and I ask you to stamp it as received and return it in the envelope provided. Please do not hesitate to call if we can be of assistance.

Very truly,

Brian D. Robinson James H. Lister

Enclosures cc: Leanne Bergeron

DOCUMENT NUMBER-DATE

08478 JUL 138

FPSC-RECORDS/REPORTING

Check received with filing and forwarded to Fiscal for deposit. Fiscal to forward a copy of check to RAR with proof of deposit.

Initials of person who forwarded sheck:

San Antonio San Diego

San Diego San Francisco Washington, D.C. Woodland Hills Affiliated Offices Brussels, Belgium Geneva, Switzerland

Direct Dial: (202) 775-7126 brobinso@arterhadden.com Direct Dial: (202) 775-7975 jlister@arterhadden.com

ORIGINA

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founded 1843

1801 K Street, N.W., Suite 400K Washington, D.C. 20006-1301 telephone 202.775.7100

facsimile 202.857.0172

ORIGINAL

San Antonio San Diego San Francisco Washington, D.C. Woodland Hills *Affiliated Offices* Brussels, Belgium Geneva, Switzerland

Direct Dial: (202) 775-7126 brobinso@arterhadden.com Direct Dial: (202) 775-7975 jlister@arterhadden.com

July 12, 2000

Via Federal Express

Ms. Blanco S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

000850-77

re: Innovative Telecom Corp.

Dear Ms. Bayo:

This letter is to inform the Commission that Innovative Telecom Corp. (holder of a Florida certificate to provide long distance service, Company Code T1515, Certificate Number 4716) has sold its assets to Enhanced Global Convergence Services Inc. d/b/a eGCS ("eGCS"), a New Hampshire Corporation authorized to do business in Florida. eGCS is today filing an application for its own certificate to provide long distance / prepaid calling service in Florida. Since the asset transfer, Innovative and eGCS have cooperated in the provision of service under the Innovative certificate.

It is our understanding following conversations with Commission staff that no formal application for approval of the asset transfer is necessary.

An extra copy of this letter is enclosed for your records. I ask you to stamp as received the copy of the letter marked "stamp & return" and send it in the envelope provided. Please do not hesitate to call if we can be of assistance.

Very truly,

Brian D. Robinson James H. Lister

Enclosures cc: Timothy Bass General Counsel, Innovative Telecom Corp. Leanne Bergeron James U. Troup



274882v1

Austin Cleveland Columbus Dallas Dayton Irvine Los Angeles Sacramento



Application of Enhanced Global Convergence Services, Inc.

#### \*\* FLORIDA PUBLIC SERVICE COMMISSION \*\*

# DIVISION OF TELECOMMUNICATIONS

Application Form For Authority To Provide Interexchange Telecommunications Service Between Points Within The State Of Florida

266278.v1

### Instructions

- This form is used as an application for an original certificate and for approval of assignment or transfer of an existing certificate. In the case of an assignment or transfer, the information provided shall be for the assignee or transferee (See Appendix A).
- <u>Print or Type</u> all responses to each item requested in the application and appendices. If an item is not applicable, please explain why.
- Use a separate sheet for each answer which will not fit the allotted space.
- Once completed, submit the original and six (6) copies of this form along with a non-refundable application fee of <u>\$250.00</u> to:

Florida Public Service Commission Division of Records and Reporting 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 (850) 413-6770

Note: **No filing fee is required** for an assignment or transfer of an existing certificate to another certificated company.

If you have questions about completing the form, contact:

Florida Public Service Commission Division of Telecommunications Bureau of Certification and Service Evaluation 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 (850) 413-6600

Page 1 of 16

DOCUMENT NUMBER-DATE

08478 JUL 138 FPSC-RECORDS/REPORTING

in .

- 1. This is an application for  $\checkmark$  (check one):
  - (✓) Original certificate (new company).

# () Approval of transfer of existing certificate:

<u>Example</u>, a certificated company purchases an existing certificated company and desires to retain the authority of both certificates.

# Approval of assignment of existing certificate: <u>Example</u>, a non-certificated company purchases an existing company and desires to retain the certificate of authority rather than apply for a new certificate.

- Approval of transfer of control: Example, a company purchases 51% of a certificated company. The Commission must approve the new controlling entity.
- 2. Name of company:

# Enhanced Giobal Convergence Services, Inc.

3. Name under which the applicant will do business (fictitious name, etc.):

## eGCS

4. Official mailing address (including street name & number, post office box, city, state, zip code):

# 45 High Street

# Nashua, NH 03060

5. Florida address (including street name & number, post office box, city, state, zip code):

# The company does not have a Florida business office. It has a Registered Agent in Florida at the following address: CT Corporation System, 1200 South Pine Island Road, Plantation, FL 33324

- 6. Select type of business your company will be conducting ✓ (check all that apply):
  - () Facilities-based carrier company owns and operates or plans to own and operate telecommunications switches and transmission facilities in Florida.
  - () Operator Service Provider company provides or plans to provide alternative operator services for IXCs; or toll operator services to call aggregator locations; or clearinghouse services to bill such calls.
  - (✓) Reseller company has or plans to have one or more switches but primarily leases the transmission facilities of other carriers. Bills its own customer base for services used. (eGCS issues no bills, as it is a prepaid calling card provider.)
  - () Switchless Rebiller company has no switch or transmission facilities but may have a billing computer. Aggregates traffic to obtain bulk discounts from underlying carrier. Rebills end users at a rate above its discount but generally below the rate end users would pay for unaggregated traffic.
  - () Multi-Location Discount Aggregator company contracts with unaffiliated entities to obtain bulk/volume discounts under multi-location discount plans from certain underlying carriers, then offers resold service by enrolling unaffiliated customers.
  - (✓) Prepaid Debit Card Provider any person or entity that purchases 800 access from an underlying carrier or unaffiliated entity for use with prepaid debit card service and/or encodes the cards with personal identification numbers.
- 7. Structure of organization:

( (	) ) )	Individual Foreign Corporation General Partnership Other	( (	ý	Corporation Foreign Partnership Limited Partnership
--------	-------------	---	--------	---	---

8.	If individual, provide:
	Name:
	Title:
	Address:
	City/State/Zip:
	Telephone No.: Fax No.:
	Internet E-Mail Address:
	Internet Website Address:
9.	<ul> <li>If incorporated in Florida, provide proof of authority to operate in Florida:</li> <li>(a) The Florida Secretary of State Corporate Registration number:</li> </ul>
10.	If foreign corporation, provide proof of authority to operate in Florida:
	(a) The Florida Secretary of State corporate Registration number:
11.	If using fictitious name-d/b/a, provide proof of compliance with fictitious name statute (Chapter 865.09, FS) to operate in Florida:
	(a) The Florida Secretary of State fictitious name registration number:
12.	If a limited liability partnership, provide proof of registration to operate in Florida:

(a) The Florida Secretary of State registration number: \_\_\_\_\_\_

If a partnership, provide name, title and address of all partners and a copy of the partnership agreement. 13.

	Name	):					
	Title:						
	Addre	ess:					
	City/S	City/State/Zip:					
	Telep	hone No.: Fax No.:					
	Interr	net E-mail Address:					
	Interr	net Website Address:					
14.		<b>preign limited partnership,</b> provide proof of compliance with the foreign d partnership statute (Chapter 620.169, FS), if applicable.					
	(a)	The Florida registration number:					
15.	Provid	de <u>F.E.I. Number</u> (if applicable): <u>02 - 0510272</u>					
16.	Provid	de the following (if applicable):					
	(a)	Will the name of your company appear on the bill for your services? ( ) Yes ( ) No					
		Not Applicable. See Answer to 16(b)					
	(b)	If not, who will bill for your services?					
		No one. This is a prepaid calling service, with cards distributed through various retail outlets. There are no bills.					
	Name	);					
	Title:						
	Addre	ess:					
	City/S	State/Zip:					
		hone No.: Fax No.:					
FORM F	PSC/CMU 3	31 12/96) Page 5 of 16					

	(c)	How is this infor	nation provided?
17.	Who	will receive the	bills for your service?
	Not a	pplicable (prep	aid calling cards)
	( ) ( ) ( )	Residential C PATs provide Hotels & mote Universities ( )	els () PATs station end-users () Hotel & motel guests
18.	Who (a)	will serve as lia <u>The applications of the T</u>	nison to the Commission with regard to the following? on:
	Name	ə:	Brian D. Robinson / James H. Lister
	Title:		Attorneys
	Addr	ess:	Arter & Hadden LLP, 1801 K Street, N. W., Suite 400K
	City/	State/Zip:	Washington, DC 20006
	Telep	ohone No.:	<u>202 - 775-7100</u> Fax No.: <u>202 - 857-0172</u>
	Inter	net E-Mail Ado	dress:jlister@arterhadden.com
	Inter	net Website A	ddress:
	(b)	Official point	of contact for the ongoing operations of the company:
	Nam	e:	Philip Wilkinson
	Title:		Chief Executive Officer
	Addr	ess:	45 High Street
	City/	State/Zip:	Nashua, NH 03060

	603 - 889-8411 Fax No.: <u>603 – 598-5511</u> dress: <u>Emails may be directed to Leanne Bergeron,</u>
	Controller, at Ibergeron@egcs.com
Internet Website A	ddress:
(c) <u>Complaints/I</u>	nquiries from customers:
Name:	Leanne Bergeron
Title:	Controller
Address:	45 High Street
City/State/Zip:	Nashua, NH 03060
Telephone No.: _	<u>603 - 889-8411</u> Fax No.: <u>603 - 589-5511</u>
Internet E-Mail Ad	dress:lbergeron@egcs.com
Internet Website A	\ddress:

- 19. List the states in which the applicant:
  - (a) has operated as an interexchange telecommunications company.

California, Missouri, Indiana, Kansas, Michigan, New Hampshire, New Jersey, Nevada, Ohio, Texas, Wisconsin (In several of these states, Applicant is in the process of commencing operations. Applicant has certification (if required) in all these states, and operations will likely be underway in all by the time the Florida certification process is completed).

(b) has applications pending to be certificated as interexchange telecommunications company.

# Arkansas, Illinois, Oklahoma, New York

is certificated to operate as an interexchange telecommunications (C) company.

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See the states listed in response to No. 19(a).
has been denied authority to operate as an interexchange telecommunications company and the circumstances involved.
None
has had regulatory penalties imposed for violations of telecommunications statutes and the circumstances involved.
None
has been involved in civil court proceedings with an interexchange carrier, local exchange company or other telecommunications entity, and the circumstances involved.
None
ate if any of the officers, directors, or any of the ten largest stockholders previously been:
adjudged bankrupt, mentally incompetent, or found guilty of any felony or of any crime, or whether such actions may result from pending proceedings. If so please explain.

FORM PSC/CMU 31 12/96) Required by Commission Rule Nos. 25-24.470, 25-24.471, and 25-24.473, 25-24.480(2).

No

20.

(b) an officer, director, partner or stockholder in any other Florida certificated telephone company. If yes, give name of company and relationship. If no longer associated with company, give reason why not.

# See Exhibit 2

21. The applicant will provide the following interexchange carrier services ✓ (check all that apply):

a	MTS with distance sensitive per minute rates
	Method of access is FGA Method of access is FGB
	Method of access is FGD (from calling card platform to called party)
	Method of access is 800 (from calling party to calling card platform)
b	MTS with route specific rates per minute
	Method of access is FGA
	Method of access is FGB
<u> </u>	Method of access is FGD (from calling card platform to called party)
	Method of access is 800 (from calling party to calling card platform)
c	MTS with statewide flat rates per minute (i.e., not distance sensitive)
	Method of access is FGA Method of access is FGB Method of access is FGD Method of access is 800
d	MTS for pay telephone service providers
e	Block-of-time calling plan (Reach Out Florida, Ring America, etc.)
f	800 service (toll free)
g	WATS type service (bulk or volume discount)
	Method of access is via dedicated facilities Method of access is via switched facilities

h		<b>Private line services (Channel Services)</b> (For ex. 1.544 mbs., DS-3, etc.)
i		Travel service
		Method of access is 950 Method of access is 800
j k		900 service Operator services
		Available to presubscribed customers Available to non presubscribed customers (for example, to patrons of hotels, students in universities, patients in
		hospitals). Available to inmates
I	1	Services included are:
		Station assistance Person-to-person assistance Directory assistance Operator verify and interrupt Conference calling

22. Submit the proposed tariff under which the company plans to begin operation. Use the format required by Commission Rule 25-24.485 (example enclosed).

See Exhibit <u>6</u>.

23. Submit the following:

# A. Financial capability.

The application **should contain** the applicant's audited financial statements for the most recent 3 years. If the applicant does not have audited financial statements, it shall so be stated.

Applicant does not have audited financials. Signed Unaudited financials for entire history of company are attached as Exhibit 3.

The unaudited financial statements should be signed by the applicant's chief executive officer and chief financial officer <u>affirming that the financial statements</u> <u>are true and correct</u> and should include:

1. the balance sheet;

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- 2. income statement; and
- 3. statement of retained earnings.

**NOTE**: This documentation may include, but is not limited to, financial statements, a projected profit and loss statement, credit references, credit bureau reports, and descriptions of business relationships with financial institutions.

Further, the following (which includes supporting documentation) should be provided:

1. <u>A written explanation</u> that the applicant has sufficient financial capability to provide the requested service in the geographic area proposed to be served.

See Exhibit 4.

2. <u>A written explanation</u> that the applicant has sufficient financial capability to maintain the requested service.

# See Exhibit 4.

3. <u>A written explanation</u> that the applicant has sufficient financial capability to meet its lease or ownership obligations.

See Exhibit 4.

**B. Managerial capability:** give resumes of employees/officers of the company that would indicate sufficient managerial experiences of each.

# See Exhibit 5.

C. Technical capability: give resumes of employees/officers of the company that would indicate sufficient technical experiences or indicate what company has been contracted to conduct technical maintenance.

# See Exhibit 5.

# \*\* APPLICANT ACKNOWLEDGMENT STATEMENT \*\*

1. REGULATORY ASSESSMENT FEE: I understand that all telephone companies must pay a regulatory assessment fee in the amount of .15 of one percent of its gross operating revenue derived from intrastate business. Regardless of the gross operating revenue of a company, a minimum annual assessment fee of #50 is required.

2. GROSS RECEIPTS TAX: I understand that all telephone companies must pay a gross receipts tax of two and one-half percent on all intra and interstate business.

3. SALES TAX: I understand that a seven percent sales tax must be paid on intra and interstate revenues.

4. APPLICATION FEE: I understand that non-refundable application fee of \$250.00 must be submitted with the application.

<u>UTILITY</u>	OFFICIAL:	7/6/00
Signature	Philip Wilkinson	' Date
	Chief Executive Officer	603 - 889-8411
Title		Telephone No.
Address:	Enhanced Global Convergence Services, In	
	45 High Street	Fax No.
	Nashua, NH 03060	
ATT 4 01 18	ITNTO.	

# ATTACHMENTS:

A - CERTIFICATE SALE, TRANSFER, OR ASSIGNMENT STATEMENT

**B - CUSTOMER DEPOSITS AND ADVANCE PAYMENTS** 

C - CURRENT FLORIDA INTRASTATE NETWORK

D - AFFIDAVIT

Not Applicable

3

# \*\* APPENDIX A \*\*

# **CERTIFICATE SALE, TRANSFER, OR ASSIGNMENT STATEMENT**

I, (Name)						.,	
(Title)						_ of	1
(Name of Company)							
and current holder of Florida Public	Service Commiss	ion Certifi	cate Nur	mber			
#, petitioner's request for a:	have reviewed	this app	lication	and	join	in	the
( ) transfer							
() assignment							
of the above-mentioned certificate.							
UTILITY OFFICIAL:							
Signature		Da	ate				
Title		Te	elephone	No.			
Address:		- Fa	ax No.				

# \*\* APPENDIX B \*\*

# CUSTOMER DEPOSITS & ADVANCE PAYMENTS

A statement of how the Commission can be assured of the security of the customer's deposits and advance payments may be provided in one of the following ways (applicant, please 4 check one):

- (4) The applicant will **not** collect deposits nor will it collect payments for service more than one month in advance. \*
- ( ) The applicant intends to collect deposits and/or advance payments for more than one month's service and will file and maintain a surety bond with the Commission in an amount equal to the current balance of deposits and advance payments in excess of one month.

(The bond must accompany the application.)

UTILITY	OFFICIAL:		,
P	4, WIL	/ ٦	6/00
Signature	Philip Wilkinson	/	Date
	Chief Executive Officer		603 - 889-8411
Title			Telephone No.
Address:	Enhanced Global Convergence Services, In	<u>IC</u>	<u>603 - 598-5911</u>
	45 High Street		Fax No.
<u></u>	Nashua, NH 03060	<u> </u>	

\* As a prepaid call card provider, applicant will furnish cards containing value that the end user can use when desired.

3

# \*\* APPENDIX C \*\*

# CURRENT FLORIDA INTRASTATE SERVICES

Applicant has ( ) or has not (  $X^*$ ) previously provided intrastate telecommunications in Florida.

\* Applicant has assisted a certified Florida carrier, Innovative Telecom Corp. in providing service, but has not itself provided service as a carrier.

If the answer is has, fully describe the following:

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a) What services have been provided and when did these services begin?

b) If the services are not currently offered, when were they discontinued?

<b>UTILITY</b>	OFFICIAL:	
	Dro Will	7/6/00
Signature	Philip Wilkinson	Þaté
	Chief Executive Officer	<u>603 - 889-8411</u>
Title		Telephone No.
Address:	Enhanced Global Convergence Services, In	n <u>c</u> . <u>603 - 598-5911</u>
		Fax No.
	45 High Street	
	Nashua, NH 03060	

# \*\* APPENDIX D \*\*

# AFFIDAVIT

By my signature below, I, the undersigned officer, attest to the accuracy of the information contained in this application and attached documents and that the applicant has the technical expertise, managerial ability, and financial capability to provide alternative local exchange company service in the State of Florida. I have read the foregoing and declare that, to the best of my knowledge and belief, the information is true and correct. I attest that I have the authority to sign on behalf of my company and agree to comply, now and in the future, with all applicable Commission rules and orders.

Further, I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."

UTILITY	<u>OFFICIAL</u>	
	lopull_	7/100
Signature	Philip Wilkinson	/ Date
	Chief Executive Officer	603 <u>- 889-8411</u>
Title		Telephone No.
Address:	Enhanced Global Convergence Services, Inc.	<u>603 - 598-5911</u>
		Fax No.
	45 High Street	
	Nashua, NH 03060	

Registration to do Business in Florida

3. .



Florida Division of Corporations Public Access	<b>Corporate Inquiry Menu:</b> Please select an inquiry type from the list below, then enter a search key in the s to begin the search.
Inquiry by:	3/29/00 CORPORATE DETAIL RECORD SCREEN
O Corporation / Trademark Name	NUM: F99000005721 ST:NH ACTIVE/FOREIGN PROF FLD: 11/04/1
Officer / Registered Agent Name	LAST: NAME CHANGE AMENDMENT FLD: 12/09/1 FEI#: 02-0510272
O Registered Agent Name	NAME : ENHANCED GLOBAL CONVERGENCE SERVICES, INC.
O Trademark Owner Name	NH: 1 PRINCIPAL: 45 HIGH STREET
	ADDRESS NASHUA, NH 03060
O Document Number	RA NAME : C T CORPORATION SYSTEM RA ADDR : 1200 SOUTH PINE ISLAND ROAD
O Trademark Name	RA ADDR : 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324 US
Search String: Search <u>HomePage</u>	ANN REP : * NONE FILED *
	Officers <u>Events Names</u> THIS IS NOT OFFICIAL RECORD; SEE DOCUMENTS IF QUESTI Document Image

FY	90000	05721
Document Number Only		
		THE T
. ·		
C T Corporation System		
Requestor's Name		FLOR P: 50
660 East Jefferson Stree Address		Dr
Tallahassee, FL 32301	(850) 222-1092 Phone	9000030654595
هه		-12/09/9901054020 *****35.00 *****35.00
CORPORAT	ION(S) NAME	
	eGCS, Inc.	
	<u>Changed name to:</u>	
Enhanced Gla	nal Convergence	Services, Inc
( ) Profit ( ) NonProfit	() Amendment	
) Limited Liebility Comp	any	
() Foreign	() Dissolution/Wil	thdrawal () Mark 5
() Limited Partnership () Reinstatement	() Annual Report () Reservation	() Other = () Cherginge of R.2.
		() artitious Name
() Certified Copy	() Photo Copies	() COS / G/S
() Call When Ready Walk In	() Call if Problem () Will Wait	() After 4:30 Pick Up
() Mail Out	()	
Name Availability		PLEASE RETURN EXTRA COPY(S)
Document	12/9	FILE STAMPED
Examiner Updater	·····	THANK YOU ! CONNIE BRYAN
Verifier		N.C.
Acknowledgment	- File -	C. COULLIETTE DEC 0 9 1999
W.P. Verifler		

e.

	eGCS	FILED
	Fictitious Name to be Registered	99 DEC -9 AM 8: 59
-	2 45 High Street	CEODE TARY OF STATE
2	CMailing Address of Business	TALLAHASSEE, FLORIDA
000000	Nashua NH 03060	
ñ	City City	
	3. Florida County of principal place of business: Leon	-
	4. FEI Number: 02-0510272	This space for office use only
ſ	A. Owner(s) of Fictitious Name If Individual(s): (Use an attac	hment if necessary):
	1. 2.	
	Last First M.I.	Last First M.I.
	Address	Address
	City State Zip Code	City State Zip Cod
N	SS#	SS#
ection	B. Owner(s) of Fictitious Name If other than an Individual: (U	se an attachment if necessary):
Ē		
Se	1. Enhanced Global Convergence Services, 2. Entity Name Inc.	Entity Name
	45 High Street	Address
	Address Nashua NH 03060	Addiese
	City State Zip Code	City State Zip Cod
	Florida Registration Number <u>F99000005721</u>	Florida Registration Number
]	FEI Number: 02-0510272	FEI Number:
	Applied for Not Applicable	Applied for D Not Applicat
L		
Section 3	I (we) the undersigned, being the sole (all the) party(ies) owning interest in the this form is true and accurate. I (we) further certify that the fictilious name sho newspaper as defined in chapter 50, Florida Statutes, in the county where the stand that the signature(s) below sha have the same legal effect as it made Enhanced Global Gonvergence Services, Inc. <u>/2-3-99</u> Signature of Owner Philip A. Wilkinson, Chief Executive Officer Phone Number: <u>(603) 889-8411</u>	own in Section 1 of this form has been adventised at least on a applicant's principal place of business is located. I (we) un
ſ	FOR CANCELLATION COMPLETE SECTION 4 ONLY:	
	FOR FICTITIOUS NAME OWNERSHIP CHANGE COMPLETE	E SECTIONS 1 THROUGH 4:
4		
	I (we) the undersigned, hereby cancel the fictitious name	
₽	, which was registered on	and was as
Section		699343900191
ທ 	registration number	-12/09/9901054- *****50.00
	Signature of Owner Date	Signature of Owner Date
	Mark the applicable boxes Certificate of Status - \$10	Certified Copy- \$30
L		

-

Officers, Directors, and Major Stockholders Holding Positions in Other Florida Certificated Entities

Person / Position with eGCS, the Applicant	Other Florida Certificated Entity in which Person has Position.	Position in Other Florida Certificated Entity	
Joseph D. Fail (President)	Communigroup, Inc.	Secretary, Treasurer, Director	
Robert J. Healea (Vice President)	Communigroup, Inc.	Vice President	
Walter J Franks, Jr. (Vice President)	Communigroup, Inc.	Vice President Executive Vice President	
Joseph D. Fail (President)	Transtel Communications, Inc.	President, CEO, Director	
Walter J. Franks, Jr. (Vice President)	Transtel Communications, Inc.	Director Executive Vice President	
D. Wayne Skelton (Secretary / Treasurer)	Transtel Communications, Inc.	Secretary, Treasurer	
Robert J. Healea (Vice President)	Transtel Communications, Inc.	Vice President	
Walter J. Frank, Jr. (Vice President)	VarTec Telecom, Inc.	Executive Vice President	
Robert J. Healea (Vice President)	VarTec Telecom, Inc.	Assistant Treasurer	

Signed Financial Statements (Filed on a Confidential Basis in a Separate Packet)

(Note that Audited Financial Statements Are not Available. Also, Philip Wilkinson, Chief Executive Officer, has signed the statements. The Company has no separate Chief Financial Officer to sign the statements. The Company began business in August 1999.)

# Narrative Discussion of Finances

Applicant already owns several switches and the computers necessary to verify prepaid calling cards, measure usage of cards, and decrement their value accordingly. It is certified (or registered, where registration is required in lieu of certification) in the 10 states listed in response to question no. 19(a) and is actively providing telecommunications services in most of those states. In other states it provides non-telecommunications services (calling card transaction processing). In short, it is an operating business receiving revenue and fully capable of providing service as a reseller in one more state. In addition, eGCS has access to a substantial loan from affiliates to help finance operations.

Resume of Key Personnel

## Phil Wilkinson

*Mr. Wilkinson* is CEO. He spent 21 years at AT&T, the last five years of which he was VP of Network Management and Customer Care. Following this he was the President and Owner of a software business for 7 years, whose clients included AT&T BCS, EDS, Optus, and Fujitsu. He also spent 2 years as CEO at another enhanced services company, providing solutions for the Postpaid and Prepaid industry.

#### Pax Andersson

*Mr. Andersson is* Managing Director of Marketing. He brings to the table a wealth of European and International Market experience. The foundation of his career was laid with a 15 year tenure at IBM branches in Sweden and the UK. Over the past ten years, Mr. Andersson has held Director and Vice President level positions within the communications industry for Preseco Information Systems, Call Sciences, and TimePlex Group.

### <u>Brain Fabiano</u>

*Mr. Fabiano is* EVP of Operations. He has 14 years of management service within the AT&T organization, most recently acting as Director of Solution Architecture for the Business Development division of AT&T Solutions. Mr. Fabiano holds degrees in Data Processing, Natural Science/Math, MS Management, and is pursuing a Phd in Technology.

### Louis Esposito

*Mr. Esposito is* VP of Operations. He has 28 years of experience in telecommunications, 25 of which were spent with NYNEX. His scope of responsibilities included quality, management, and operational aspects within the Technical Field Service area. Mr. Esposito also held management positions with TDS Datacom, and MTS Services.

<u>Exhibit 6</u>

**Proposed Florida Tariff** 

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269122v2

# TITLE SHEET

## FLORIDA TELECOMMUNICATIONS TARIFF

### ENHANCED GLOBAL CONVERGENCE SERVICES, INC.

This tariff contains the descriptions, regulations, and rates applicable to the furnishing of service and facilities for interexchange telecommunications services provided by Enhanced Global Convergence Services, Inc. d/b/a eGCS, with principal offices at 45 High Street, Nashua, NH 03060. This tariff applies for services furnished within the State of Florida. This tariff is on file with the Florida Public Service Commission, and copies may be inspected, during normal business hours, at the Company's principal place of business.

ISSUED: \_

By:

EFFECTIVE:

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# TABLE OF CONTENTS

Title Page	1
Table of Contents	2
Check Sheet	3
Symbols	4
Tariff Format	5
Section 1 - Technical Terms and Abbreviations	6
Section 2 - Rules and Regulations	7
Section 3 - Description of Service	13
Section 4 - Rates	16

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_

#### CHECK SHEET

The sheets listed below, which are inclusive of this tariff, are effective as of the date shown at the bottom of the respective sheet(s). Original and revised pages, as named below, contain all changes from the original tariff that are in effect on the date thereon except as otherwise noted.

SHEET	REVISION
1 2 3 4 5 6 7 8 9 10 11 12	Original Original Original Original Original Original Original Original Original Original Original Original Original
13	Original
13	Original
15 16	Original Original
17	Original

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_

## SYMBOLS SHEET

Explanation of Symbols - When changes are made in any tariff sheet, a revised sheet will be issued canceling the tariff sheet affected. Changes will be identified on the revised sheet(s) through the use of the following symbols:

- D Delete or Discontinue
- I Change Resulting In An Increase To A Customer's Bill
- M Moved From Another Tariff Location
- N New

d/b/a eGCS

- R Change Resulting In A Reduction To A Customer's Bill
- T Change in Text or Regulation but No Change in Rate or Charge

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_

# TARIFF FORMAT SHEETS

A. Sheet Numbering - Sheet numbers appear in the upper right corner of the page. Sheets are numbered sequentially. However, new sheets are occasionally added to the tariff. Then a new sheet is added between sheets already in effect, a decimal is added. For example, a new sheet added between sheets 14 and 15 would be 14.1.

B. Sheet Revision Numbers - Revision numbers also appear in the upper right corner of each page. These numbers are used to determine the most current sheet version on file with the FPSC. For example, the 4th revised Sheet 14 cancels the 3rd revised Sheet 14. Because of various suspension periods, deferrals, etc, the FPSC follows in their tariff approval process, the most current sheet number on file with the Commission is not always the tariff page in effect. Consult the Check Sheet for the sheet currently in effect.

C. **Paragraph Numbering Sequence** - There are nine levels of paragraph coding. Each level of coding is subservient to its next higher level:

2. 2.1. 2.1.1. 2.1.1.A. 2.1.1.A.1. 2.1.1.A.1.(a). 2.1.1.A.1.(a).1. 2.1.1.A.1.(a).1.(i) 2.1.1.A.1.(a).1.(i).(1).

D. Check Sheets - Then a tariff filing is made with the FPSC, an updated check sheet accompanies the tariff filing. The check sheet lists the sheets contained in the tariff, with a cross reference to the current revision number. Then new pages are added, the check sheet is changed to reflect the revision. All revisions made in a given filing are designated by an asterisk (\*). There will be no other symbols used on this page if these are the only changes made to it (i.e., the format, etc. remains the same, just revised revision levels on some pages). The tariff user should refer to the latest check sheet to find out if a particular sheet is the most current on file with the FPSC.

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EFFECTIVE: \_\_\_\_

Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

#### SECTION 1 - TECHNICAL TERMS AND ABBREVIATIONS

Authorized User - A person, firm, corporation, or any other entity authorized by the Customer to communicate utilizing the Carrier's service.

Authorization Code - A numerical code, one or more of which are assigned to a Customer to enable it to access the Service provided by the Company and to identify the Customer for billing purposes.

**Carrier or Company -** Whenever used in this tariff, "Carrier," "Company," refers to ENHANCED GLOBAL CONVERGENCE SERVICES, INC. d/b/a eGCS unless otherwise specified or clearly indicated by the context.

Commission – Florida Public Service Commission ("FPSC")

**Customer** - The person, firm, corporation, or other entity which orders, cancels, amends, or uses service and is responsible for payment of charges and compliance with the Company's tariff.

LEC - Local Exchange Company.

**Prepaid Account** – An inventory of calling value purchased in advance by the Customer; the Prepaid Account is associated with a specific Authorization Code and Prepaid Calling Card.

**Prepaid Calling Card** - A card issued by the Company, associated with an Authorization Code which identifies a specific Prepaid Account, which enables calls to be processed, account activity to be logged, and balances to be maintained, on a prepayment basis.

ISSUED: \_\_\_\_

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#### 2.1 Undertaking of The Company

The Company's services and facilities are furnished for telecommunications services between and among domestic points within the State of Florida as specified herein. The Company installs, operates, and maintains the communications services provided in accordance with the terms and conditions set forth in this tariff.

#### 2.2 Limitations

- 2.2.1 Service is offered subject to the availability of the necessary facilities and equipment, and subject to the provisions of this tariff.
- 2.2.2 The Company reserves the right to discontinue or limit service when necessitated by conditions beyond its control, or when the Customer is using service in violation of provisions of this tariff, or in violation of the law.
- 2.2.3 The Company does not undertake to transmit messages, but offers the use of its facilities when available, and will not be liable for errors in transmission or for failure to establish connections.

#### 2.3 Responsibility and Use

- 2.3.1 Services provided under this tariff may be used for any lawful purpose for which the service is technically suited subject to the terms and conditions set forth herein and in any applicable Service Order. Subject to the limitations and conditions set forth in this tariff, services are available for use twenty-four (24) hours per day, seven (7) days per week.
- 2.3.2 Customer is solely responsible for (i) prevention of unauthorized unlawful or fraudulent use of or access to Services; and (ii) administration and non-disclosure of any Authorization Codes provided by the Company to the Customer.

ISSUED:	

EFFECTIVE: \_\_\_\_\_

Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

#### 2.4 Liabilities of the Company

- 2.4.1 The Company's liability for damages arising out of mistakes, interruptions, omissions, delays, errors, or defects in transmission which occur in the course of furnishing service or facilities, in no event shall exceed an amount equivalent to the proportionate charge to the Customer for the period during which the faults in transmission occur.
- 2.4.2 The Company shall not be liable for claim or loss, expense or damage (including indirect, special or consequential damage), for any interruption, delay, error, omission, or defect in any service, facility, or transmission provided under this tariff, if caused by any person or entity other than the Company, by any malfunction of any service or facility provided by any other carrier, by an act of God, fire, war, civil disturbance, or act of government, or by any other cause beyond the Company's direct control.
- 2.4.3 The Company shall not be liable for, and shall be fully indemnified and held harmless by Customer against any claim or loss, expense, or damage (including indirect, special or consequential damage) for defamation, libel, slander, invasion, infringement of copyright or patent, unauthorized use of any trademark, tradename, or service mark, unfair competition, interference with or misappropriation or violation of any contract, proprietary or creative right, or any other injury to any person, property or entity arising out of the material, data, information, or other content revealed to, transmitted, or used by the Company under this tariff; or for any act or omission of the Customer; or for any personal injury or death of any person caused directly or indirectly by the installation, maintenance, location, condition, operation, failure, presence, use or removal of equipment or wiring provided by the Company.
- 2.4.4 The Company shall not be liable and Customer shall indemnify, defend and hold harmless the Company and its officers, directors, employees, agents and representatives, free and harmless from any and all claims, actions, suits, liability, loss, damages, costs, expenses, judgments, deficiencies, charges and reasonable fees of legal counsel arising out of or in connection with: (a) any claims of whatever nature by a third party for damages with respect to the provision of telecommunications services by the Customer; and (b) any claim by any third party for commissions or other compensation allegedly arising from the resale of the Services sold to the Customer under this tariff.

ISSUED: \_\_\_\_

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#### 2.5 Deposits

The Company does not require a deposit from the Customer.

#### 2.6 Payment for Service and Billing

The Company's prepaid calling card service does not require that bills be sent to end-users.

The Company reserves the right to bill end users for any service or usage used that has not been prepaid. If the Company issues such a bill, the following rules (to the extent not inconsistent with the Commission's rules) shall apply:

The Customer is responsible for payment of all charges for services and equipment furnished to the Customer or to an Authorized User of the Customer by the Company. All charges due by the Customer are payable to the Company or to any agency duly authorized to receive such payments. The billing agency may be a local exchange telephone company, interexchange carrier, or other billing service. Terms of payment shall be according to the rules and regulations of the agency and subject to the rules of appropriate regulatory agencies. Any objections to billed charges must be promptly reported to the Company or the Company's billing agent. Customers may contact the Company at Enhanced Global Convergence Services, Inc. d/b/a eGCS, 45 High Street, Nashua, NH 03060; or by telephone number 603-889-8411. Adjustments to Customer's bills shall be made to the extent that circumstances exist which reasonably indicate that such changes are appropriate.

ISSUED:

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Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

## 2.7 Refusal or Discontinuance by Company

The Company may refuse or discontinue service without liability to the Customer under the following conditions:

- 2.7.1 For non-compliance with or violation of any State, municipal, or Federal law, ordinance or regulation pertaining to telephone service.
- 2.7.2 For use of telephone service for any other purpose than that described in this tariff.
- 2.7.3 For neglect or refusal to provide reasonable access to the Company or its agents for the purpose of inspection and maintenance of equipment owned by the Company or its agents.
- 2.7.4 For noncompliance with or violation of Commission regulation or the Company's rules and regulations on file with the Commission.
- 2.7.5 For nonpayment of bills.
- 2.7.6 In the event that Customer or Authorized User uses equipment in such a manner as to adversely affect the Company's equipment or service to others.
- 2.7.7 In the event of tampering with the equipment or services owned by Company or its agents.
- 2.7.8 In the event of unauthorized or fraudulent use of service.
- 2.7.9 By reason of any order or decision of a court or other government authority having jurisdiction which prohibits the Carrier from furnishing such services.
- 2.7.10 For extended periods of inactivity.
- 2.7.11 If underlying carrier notifies the Company of "abuse" of the services being purchased from such underlying carrier and the Company reasonably believes in good faith that the abuse cited by the Carrier relates to the Services purchased by the Customer hereunder.

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Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

#### 2.8 Interruption of Service

Credit allowances for interruptions of service are subject to the general liability provisions set forth in Section 2.4 and general Prepaid Calling Card provisions in Section 3.1 herein. However, no credit allowance shall be provided for interruptions due to testing or equipment adjustments by the Carrier, the negligence of the Customer, or for the failure of channels, equipment or communications systems provided by the Customer. It shall be the obligation of the Customer to notify Carrier immediately of any interruption in service for which a credit allowance is desired by Customer. Before giving such notice, Customer shall ascertain that the trouble is not within his or her control, or is not in wiring or equipment, if any, furnished by Customer.

#### 2.9 Restoration of Service

The use and restoration of service shall be in accordance with the rules and regulations of the Commission.

#### 2.10 Inspection, Testing, and Adjustment

Upon reasonable notice, the facilities provided by the Carrier shall be made available to the Carrier for tests and adjustments as may be deemed necessary by the Carrier for maintenance. No interruption allowance will be granted for the time during which such tests and adjustments are made.

#### 2.11 Tests, Pilots, Promotional Campaigns and Contests

The Carrier may conduct special tests or pilot programs and promotions at its discretion to demonstrate the ease of use, quality of service and to promote the sale of its services.

#### 2.12 Cost of Collection and Repair

The Customer is responsible for any and all costs incurred in the collection of monies due the Carrier including legal and accounting expenses. Customer is also responsible for recovery costs of Carrier-provided equipment and any expenses required for repair or replacement of damaged equipment.

ISSUED:	
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EFFECTIVE:

Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

#### 2.13 Late Fee

The Company's prepaid calling card service does not require that bills be sent to end-users, and so late charges will normally not be applicable.

The Company reserves the right to bill end users for any service or usage that has not been prepaid and to collect late fees for bills not timely paid. If the Company issues such a bill, the following rules (to the extent not inconsistent with the Commission's rules) shall apply:

A late fee of 1.5% may be charged on any past due balances after 30 days from the mailing date of the bill.

#### 2.14 Reconnection Charge

A reconnection fee of \$25.00 per occurrence may be charged when service is re-established for customer accounts that have been disconnected for non-payment.

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_

#### **SECTION 3 - DESCRIPTION OF SERVICE**

#### 3.1 Prepaid Calling Card Service.

This service permits use of the Company's Prepaid Calling Cards for placing long distance calls. Customers may purchase the Company's Prepaid Calling Cards at a variety of retail outlets or through other distribution channels. Prepaid Calling Cards are available at a variety of face values ranging from ten dollars (\$10.00) to fifty dollars (\$50.00) in ten dollar increments. The Company's Prepaid Calling Card service is accessed using the Company's toll-free number printed on the card. The caller is prompted by an automated voice response system to enter his/her Authorization Code, and then to enter the terminating telephone number. The Company's processor tracks the call duration on a real time basis to determine the value consumed. The total value consumed, which includes applicable taxes, is deducted from the remaining balance on the Customer's Prepaid Calling Card. The rate at which a Prepaid Calling Card is decremented depends on the Rate Plan associated with that Prepaid Calling Card. Rate Plans are described in Section 4 below.

All calls must be charged against a Prepaid Calling Card issued by the Company that has a sufficient balance to pay for the call. A Customer's call will be interrupted with an announcement when the balance is about to be depleted. Such announcement will occur when one (1) minute remains before the balance will be depleted, based upon the terminating location of the call.

Calls in progress will be terminated by the Company if the balance on the Prepaid Calling Card is insufficient to continue the call and the Customer fails to enter the number of another valid Prepaid Calling Card prior to termination.

Prepaid Calling Cards will expire at the time printed on the card.

ISSUED:

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Philip Wilkinson, CEO 45 High Street Nashua, NH 03060

#### SECTION 3 - DESCRIPTION OF SERVICE, CONT.

#### 3.1 Prepaid Calling Card Service, Cont.

Credit allowances for calls pursuant to the Company's Prepaid Card Service do not apply for interruptions not reported promptly to the Company or interruptions that are due to the failure of power, equipment or systems not provided by the Company.

Credit for failure of service shall be allowed only when such failure is caused by or occurs due to causes within the control of the Company.

The Company will block all calls beginning with the NPA "900', and NXX "976" calls, therefore such calls can not be completed.

#### 3.2 Specialized Pricing Arrangements.

Customized service packages and competitive pricing packages at negotiated rates may be furnished on a case-by-case basis in response to requests by Customers to the Company for proposals or for competitive bids. Service offered under this tariff provision will be provided to Customers pursuant to contract. Unless otherwise specified, the regulations for such arrangements are in addition to the applicable regulations and prices in other sections of the tariff.

ISSUED:

By:

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# SECTION 3 - DESCRIPTION OF SERVICE, CONT.

## 3.3 Timing of Calls

- 3.3.1 Long distance usage charges are based on the actual usage of the Company's network. The Company will determine that a call has been established by signal from the local telephone company.
- 3.3.2 Minimum billed call duration and billing increments may differ from product to product.
- 3.3.3 Usage is measured and rounded to the next higher billing increment for billing purposes.
- 3.3.4 There is no billing applied for incomplete calls.

ISSUED:

By:

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#### **SECTION 4 - RATES**

#### 4.1 Computation of Charges

There are three rate components used in calculating the total charge for each intrastate call made using the Prepaid Calling Card Service: (1) a Payphone Surcharge assessed once per call for calls originating from a payphone, (2) a Domestic Rate that is assessed for each minute that the call continues, and (3) a Domestic Surcharge assessed once per call, including those calls for which the Payphone Surcharge also applies. The Payphone Surcharge, Domestic Rate, and Domestic Surcharge constitute the particular Rate Plan that is associated with each Prepaid Calling Card. Current Rate Plans are set forth in Section 4.2.

In addition to the above, a separate surcharge is assessed for directory assistance calls, where such calling is available. This charge is stated at the conclusion of 4.2 below. Separate non-regulated charges are assessed for wireless and audio text calls.

#### 4.2 Current Rates

	Charges Applicable to Rate Plan (See 4.1 Above)		
	Payphone Surcharge	Domestic Rate	Domestic Surcharge
Rate Plan	(Once per-call for calls from payphones)	(Per- Minute of call duration)	(Once per-call)
.020 Plan	0.052	0.020	0.000
.025 Plan	0.050	0.025	0.000
.030 Plan	0.060	0.030	0.000
.035 Plan	0.070	0.035	0.000
.035 NPS Plan	0.000	0.035	0.000
.037 Plan	0.073	0.037	0.000
.039 Plan	0.078	0.039	0.000
.040 Plan	0.080	0.040	0.000
.047 Plan	0.095	0.047	0.000
.048 Plan	0.398	0.048	0.000
.048 NPS Plan	0.000	0.048	0.000
.049 Plan	0.500	0.049	0.650
.050 Plan	0.100	0.050	0.000
.055 Plan	0.110	0.055	0.000
.057 Plan	0.500	0.057	0.750
.060 Plan	0.120	0.060	0.000
.064 Plan	0.000	0.064	0.000
.065 Plan	0.000	0.065	0.000
.067 Plan	0.134	0.067	0.000
.069 Plan	0.500	0.069	0.490
.070 NPS Plan	0.000	0.070	0.000
.070 Plan	0.140	0.070	0.000
.071 Plan	0.142	0.071	0.000
.075 NPS Plan	0.000	0.075	0.000

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_

# ENHANCED GLOBAL CU /ERGENCE SERVICES, INC. d/b/a eGCS

Florida Tariff No. 1 Original Sheet 17

	(Table Continued From prev	vious page)	
	Charge	s Applicable to Rate f	Plan
	onarge	(See 4.1 Above)	
	Payphone	Domestic	Domestic
	Surcharge	Rate	Surcharge
Rate Plan	(Once per-call for calls	(Per-Minute of	(Once per-call)
Rate Flan	from payphones)	call duration)	(office per dail)
	0.150	0.075	0.000
.075 Plan	0.500	0.079	0.490
.079 Plan	0.168	0.084	0.000
.084 Plan	0.100	0.085	0.000
.085 Plan	0.180	0.090	0.000
.090 Plan	0.100	0.095	0.350
.095 Plan	0.500	0.099	0.490
.099 Plan		0.100	0.000
.100 Plan	0.398		0.000
.103 Plan	0.206	0.103	0.000
.110 Plan	0.000	0.110	0.000
.114 Plan	0.227	0.114	0.000
.120 Plan	0.350	0.120	
.125 Plan	0.000	0.125	0.000
.127 Plan	0.000	0.127	0.000
.128 Plan	0.255	0.128	0.000
.129 Plan	0.600	0.129	0.490
.130 Plan	0.570	0.130	0.000
.133 Plan	0.600	0.133	0.490
.135 Plan	0.270	0.135	0.000
.140 Plan	0.280	0.140	0.000
.145 Plan	0.435	0.145	0.000
.150 Plan	0.300	0.150	0.000
.169 Plan	0.500	0.169	0.000
.170 Plan	0.500	0.170	0.000
.175 Plan	0.398	0.175	0.000
.190 Plan	0.500	0.190	0.190
.199 Plan	0.500	0.199	0.000
.200 Plan	0.500	0.200	0.000
.249 Plan	0.498	0.249	0.000
0.250 Plan	0.500	0.250	0.000
0.265 Plan	0.500	0.265	0.000
0.270 Plan	0.540	0.270	0.000
0.275 Plan	0.000	0.275	0.000
0.283 Plan	0.566	0.283	0.000
0.285 Plan	0.570	0.285	0.000
0.299 Plan	0.598	0.299	0.000
0.300 Plan	0.570	0.300	0.000
0.330 Plan	0.500	0.330	0.000
0.333 Plan	0.666	0.333	0.000
0.400 Plan	0.800	0.400	0.000
0.500 Plan	0.398	0.500	0.000
	Dir. Assistance \$0	.49 per call, plus	
		).60 per minute, where	
		ailable	
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 available

 Note: Rates may vary according to volume and term in separately negotiated contracts

ISSUED:

By:

EFFECTIVE: \_\_\_\_\_



#### founded 1843

1801 K Street, N.W., Suite 400K Washington, D.C. 20006-1301

> telephone 202.775.7100 facsimile 202.857.0172

San Antonio San Diego San Francisco Washington, D.C. Woodland Hills Affiliated Offices Brussels, Belgium Geneva, Switzerland

ORIGINAL

Direct Dial: (202) 775-7126 brobinso@arterhadden.com Direct Dial: (202) 775-7975 jlister@arterhadden.com

Cleveland Columbus Dailas Dayton Irvine Los Angeles Sacramento :: රා <u>\_\_\_\_</u> Via Federal Express

July 12, 2000

C00850-TI

Ms. Blanco S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

 DEPOSIT
 DATE

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 JUL 1 4 2000

(1) Certification Application

APP \_\_\_\_\_ CAF \_\_\_\_\_

CMP

Austin

- - -

(2)

re:

Enhanced Global Convergence Services Inc. d/b/a eGCS Request for Confidential Treatment of Financial Exhibit

COM \_\_\_\_\_ Dear Ms. Bayo:

ECR LEG \_\_\_\_\_ Enclosed please find an original and five (5) copies of a certification application (long OPC \_\_\_\_\_\_distance / prepaid debit cards) for the above-referenced company. Also enclosed is a \$250 check PAI \_\_\_\_\_\_for the filing fee.

SEC

SER \_\_\_\_\_ Pursuant to Florida Statutes Secs. 364.18 and 364.183, confidential treatment is OTH \_\_\_\_\_\_respectfully requested for the financial statements furnished to support the application. This detailed financial information (Exhibit 3) would not normally be made available to competitors, and its public disclosure would provide an unfair advantage to competitors, who could analyze

THIS CHECK IS VOID WITHOUT A BLUE & GREEN BACKGROUND AND	D AN ARTIFICIAL WATERMARK CERTIFICATION SEAL ON THE BACK - HOLD AT ANGLE TO VIEW SEAL
Arter & Hadden LLP	Bank One Cleveland, Ohio
1801 K Street N.W. Suite 400K Washington, DC 20006–1301	a new provide the second s
	CHECK DATE
ALL	077/12/00
PAY ************************************	*****Two Hundred Fifty & 00/100 DOLLARS
	Arter & Hadden LLP
το <sup> </sup> Florida Public Service	
THE 2540 Shumard Oak Boule	
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of Tallahassee, Florida	VOID AFTER ONE YEAR EROM ISSUE DATE
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Austin Cleveland Columbus Dallas Dayton Irvine Los Angeles Sacramento	MI 9-11	founded 1843 1801 K Street, N.W., Suite 400K Washington, D.C. 20006-1301 telephone 202.775.7100 facsimile 202.857.0172	San Antonio San Diego San Francisco Washington, D.C. Woodland Hills Affiliated Offices Brussels, Belgium Geneva, Switzerland
Via	00 JUL 13	July 12, 2000	Direct Dial: (202) 775-7126 brobinso@arterhadden.com Direct Dial: (202) 775-7975 jlister@arterhadden.com
Ms Dir Flo	. Blar ector, rida F	nco S. Bayo , Division of Records and Reporting Public Service Commission umard Oak Boulevard D 3 25 *	DATE JUL 1 / 2001

re:	(1)	Certification Application
		Enhanced Global Convergence Services Inc. d/b/a eGCS
	(2)	Request for Confidential Treatment of Financial Exhibit

Dear Ms. Bayo:

2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Enclosed please find an original and five (5) copies of a certification application (long distance / prepaid debit cards) for the above-referenced company. Also enclosed is a \$250 check for the filing fee.

Pursuant to Florida Statutes Secs. 364.18 and 364.183, confidential treatment is respectfully requested for the financial statements furnished to support the application. This detailed financial information (Exhibit 3) would not normally be made available to competitors, and its public disclosure would provide an unfair advantage to competitors, who could analyze the company's revenues and expenses. Consequently, one copy of Exhibit 3 is provided in a sealed envelope marked "confidential."

An extra copy of this letter is enclosed, and I ask you to stamp it as received and return it in the envelope provided. Please do not hesitate to call if we can be of assistance.

Very truly. Brian D Robinson

Brian D. Robinson James H. Lister

Check received with filing and forwarded to Fiscal for deposit. Fiscal to forward a copy of check to RAR with proof of deposit.

initialis of person who forwarded ensek:

ORIGINA

Enclosures cc:

Leanne Bergeron



#### founded 1843

1801 K Street, N.W., Suite 400K Washington, D.C. 20006-1301 telephone 202.775.7100 facsimile 202.857.0172 STAMP & RETURN

San Antonio San Diego San Francisco Washington, D.C. Woodland Hills Affiliated Offices Brussels, Belgium Geneva, Switzerland

Direct Dial: (202) 775-7126 brobinso@arterhadden.com Direct Dial: (202) 775-7975 jlister@arterhadden.com

July 12, 2000

Via Federal Express

Ms. Blanco S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

000850-17

 re: (1) Certification Application Enhanced Global Convergence Services Inc. d/b/a eGCS
 (2) Request for Confidential Treatment of Financial Exhibit

Dear Ms. Bayo:

Enclosed please find an original and five (5) copies of a certification application (long distance / prepaid debit cards) for the above-referenced company. Also enclosed is a \$250 check for the filing fee.

Pursuant to Florida Statutes Secs. 364.18 and 364.183, confidential treatment is respectfully requested for the financial statements furnished to support the application. This detailed financial information (Exhibit 3) would not normally be made available to competitors, and its public disclosure would provide an unfair advantage to competitors, who could analyze the company's revenues and expenses. Consequently, one copy of Exhibit 3 is provided in a sealed envelope marked "confidential."

An extra copy of this letter is enclosed, and I ask you to stamp it as received and return it in the envelope provided. Please do not hesitate to call if we can be of assistance.

Very truly,

Brian D. Robinson James H. Lister



This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN <u>OS 480-00</u>. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

Austin Cleveland Columbus Dallas Dayton Irvine Los Angeles Sacramento

2748861

cc:

Enclosures