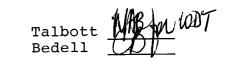


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Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: DECEMBER 9, 1999

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING

- **FROM:** DIVISION OF LEGAL SERVICES (VACCARO)
- RE: DOCKET NO. 991663-TX INITIATION OF SHOW CAUSE PROCEEDINGS AGAINST CIO, INC. FOR APPARENT VIOLATION OF RULE 25-24.805, F.A.C., CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY REQUIRED, SECTION 364.183, F.S., ACCESS TO COMPANY RECORDS AND SECTION 364.185, F.S., INVESTIGATIONS AND INSPECTIONS; POWER OF COMMISSION.
- AGENDA: 12/21/99 REGULAR AGENDA SHOW CAUSE INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: PLACE DOCKETS 990971-TX, 991663-TX, AND 991664-TX IN SEQUENCE ON AGENDA CONFERENCE SCHEDULE.

FILE NAME AND LOCATION: S:\PSC\CMU\WP\991663.RCM

CASE BACKGROUND

- September 1998 TeleConex, Inc. d/b/a TeleConex (TeleConex), a certificated alternative local exchange company (ALEC), entered into a marketing arrangement with CIO, Inc. (CIO).
- May 9, 1999 CIO entered into a marketing agreement with Pre-Cell Solutions, Inc. (Pre-Cell), another certificated ALEC.
- May 12, 1999 The Division of Consumer Affairs (CAF) received a complaint from TeleConex regarding the solicitation of its customers by CIO (a.k.a. Family Phone Services) on behalf of Pre-Cell.

DOCUMENT NUMBER-DATE

15116 DEC-98

FPSC-RECORDS/REPORTING

- June 1999 Staff received calls from TeleConex's customers who were concerned and confused regarding the phone calls and information they were provided by CIO concerning the stability of TeleConex.
- June 24, 1999 Staff met with TeleConex to discuss the problems they were having with CIO. TeleConex stated that CIO was collecting money from customers on its behalf and not forwarding the monies to TeleConex. In addition, CIO was marketing TeleConex's customers stating that TeleConex was in bankruptcy and CIO could provide the customers with a less expensive service through Pre-Cell. (Attachment A, Pages 9-12)
- July 27, 1999 CIO submitted its application for alternative local exchange service (ALEC) in the State of Florida.
- July 30, 1999 Staff mailed a letter to CIO stating that it needed to amend its corporate name, price list and the application.
- September 13, 1999 After no response from CIO to the July 30, 1999 letter, staff mailed a certified letter to CIO requesting that the amendments be made before September 28, 1999, or staff would recommend denying its application. The letter was signed for and received on September 16, 1999.
- September 21, 1999 CIO submitted a revised application along with a request to withdraw its price list along with a statement that prior to providing local service, CIO would submit a price list.
- September 27, 1999 Staff requested deferral of this docket from the October 5, 1999 Agenda Conference.
- September 28, 1999 Pre-Cell terminated its marketing agreement with CIO for CIO's failure to remit monies collected from customers for telephone service to Pre-Cell. According to invoices received from customers, CIO was billing and collecting monies from customers for telecommunications services in apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity. The invoices specifically requested that the payments be made directly to CIO/Family Phone Services. (Attachment B, Page 13)

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- September 1999 Pre-Cell provided letters to its customers indicating that it had canceled its agreement with CIO and that the customers should remit payments directly to Pre-Cell. (Attachment C, Page 14)
- October 6, 1999 CIO mailed letters to customers of Pre-Cell stating that Pre-Cell is a scam and that the monies should continue to be remitted to CIO in Palm Bay. (Attachment D, Page 15)
- October 1999 Staff began receiving customer complaints regarding the letters received from CIO and Pre-Cell.
- October 1999 BellSouth submitted information to staff relating to the establishment of numerous accounts for telecommunications service in the name of CIO a.k.a. Family Phone Services. (Attachment E, Pages 16-20)
- October 20, 1999 Notice was sent to Mr. Richard Austin, president of CIO, by the Division of Auditing and Financial Analysis informing him of an investigation of financial records.
- November 12, 1999 Staff received an audit report stating that CIO had failed to allow audit staff in to review financial records.
- November 15, 1999 All telephone numbers used by staff to contact CIO were disconnected.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission order CIO, Inc. to show cause why a fine of \$25,000 should not be imposed for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required?

RECOMMENDATION: Yes. The Commission should order CIO to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$25,000 for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. The company's response should contain specific allegations of fact or law. If CIO fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fines are paid, they should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes. (Biegalski)

STAFF ANALYSIS: Staff became aware of the operations of CIO on June 24, 1999, through its meeting with TeleConex. TeleConex staff informed that CIO was representing itself as а telecommunications provider in its solicitation for service. At this time, staff notified CIO that it needed to obtain а certificate. In addition, CIO stopped remitting payments for telecommunications service that were submitted directly to CIO by customers to TeleConex. Therefore, TeleConex terminated its agreement with CIO.

At this time, CIO entered into an agreement with Pre-Cell to solicit its services. However, CIO continued representing itself as a telecommunications provider, in addition to not paying Pre-Cell, while marketing and collecting payments for Pre-Cell. Based on the complaints staff has handled, it appears that the customers truly believe that their service is with CIO.

After its relationship with TeleConex was terminated, but prior to the termination of the Pre-Cell agreement, CIO applied for a certificate to provide alternative local exchange service on July 27, 1999. Prior to the approval of CIO's application, staff received information from BellSouth regarding the installation of numerous lines and establishment of several accounts by CIO. In addition, when calling the telephone number listed on customer invoices, CIO announces that it can provide telephone service and

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for a list of the products and services please press a specified number. This would lead a caller to believe CIO is providing telecommunications service.

By Section 364.285, Florida Statutes, the Commission is authorized to impose upon any entity subject to its jurisdiction a penalty of not more than \$25,000 for each offense, if such entity is found to have refused to comply with or to have willfully violated any lawful rule or order of the Commission, or any provision of Chapter 364. Utilities are charged with knowledge of the Commission's rules and statutes. Additionally, "[i]t is a common maxim, familiar to all minds, that 'ignorance of the law' will not excuse any person, either civilly or criminally." <u>Barlow</u> <u>v. United States</u>, 32 U.S. 404, 411 (1833).

Staff believes that CIO's conduct in acting as an ALEC without a certificate of public convenience and necessity, in apparent violation of Commission Rule 25-24.805, Florida Administrative Code, has been "willful" in the sense intended by Section 364.285, Florida Statutes. In Order No. 24306, issued April 1, 1991, in Docket No. 890216-TL, In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C., Relating To Tax Savings Refund for 1988 and 1989 For GTE Florida, Inc., having found that the company had not intended to violate the rule, the Commission nevertheless found it appropriate to order it to show cause why it should not be fined, stating that "In our view, willful implies intent to do an act, and this is distinct from intent to violate a rule." Thus, any intentional act, such as CIO's conduct at issue here, would meet the standard for a "willful violation."

Therefore, the Commission should order CIO to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$25,000 for apparent violation of Rule 25-24.805, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. The company's response should contain specific allegations of fact or law. If CIO fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fines are paid, they should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes

ISSUE 2: Should the Commission order CIO, Inc. to show cause why a fine of \$25,000 should not be imposed for apparent violation of Section 364.183, Florida Statutes, Access to Company Records, and Section 364.185, Florida Statutes, Investigations and inspections; power of commission?

RECOMMENDATION: Yes. The Commission should order CIO to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$25,000 for apparent violation of Section 364.183, Florida Statutes, Access to company records, and Section 364.185, Florida Statutes, Investigations and inspections; power of commission. The company's response should contain specific allegations of fact or law. If CIO fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fine is paid, it should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes. (**Biegalski**)

STAFF ANALYSIS: Section 364.183, Florida Statutes, states in pertinent part:

(1) The commission shall have access to all records of a telecommunications company that are reasonable necessary for the disposition of matters within the commission's jurisdiction.

In addition, Section 364.185, Florida Statutes, states in pertinent part:

The commission or its duly authorized representatives may during all reasonable hours enter upon any premises occupied by any telecommunications company and may set up and use thereon all necessary apparatus and appliances for the purpose of making investigations, inspections, examinations, and tests and exercising any power this chapter; conferred by however, the telecommunications company shall be notified of and be represented at the making of such investigations, inspections, examinations, and tests.

On October 20, 1999, staff notified Mr. Rick Austin, president of CIO, of the intent to conduct an audit of CIO's books and records. On October 26, 1999, staff called Mr. Austin and scheduled an audit for October 29, 1999. On the evening of October 28, 1999, Mr. Austin contacted staff and canceled the audit. On October 29, 1999, staff mailed a certified letter to Mr. Austin

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requesting that he respond with an acceptable time and date for staff to conduct the audit. Mr. Austin received the letter on November 1, 1999, but to date, staff has not received a response.

Due to Mr. Austin's lack of cooperation with staff concerning the requested audit, staff recommends that the Commission order CIO to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$25,000 for apparent violation of Section 364.183, Florida Statutes, Access to company records, and Section 364.185, Florida Statutes, Investigations and inspections; power of commission. The company's response should contain specific allegations of fact or law. If CIO fails to respond to the show cause order, the fine should be deemed assessed. If the fine is not paid within ten business days after the Order becomes final, it should be forwarded to the Office of the Comptroller for collection. If the fine is paid, it should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes.

ISSUE 3: Should this docket be closed?

RECOMMENDATION: If staff's recommendation in Issues 1 and 2 are approved, then CIO will have 21 days from the issuance of the Commission's show cause order to respond in writing why it should not be fined in the amounts proposed. If CIO timely responds to the show cause order, this docket should remain open pending resolution of the show cause proceeding. If CIO fails to respond to the show cause order, the fines will be deemed assessed. If the fines are not received within ten business days after the expiration of the show cause response period, they should be forwarded to the Office of the Comptroller for collection and this docket may be closed administratively. (Vaccaro)

STAFF ANALYSIS: If staff's recommendation in Issues 1 and 2 are approved, then CIO will have 21 days from the issuance of the Commission's show cause order to respond in writing why it should not be fined in the amount proposed. If CIO timely responds to the show cause order, this docket should remain open pending resolution of the show cause proceeding. If CIO fails to respond to the show cause order, the fines will be deemed assessed. If the fines are not received within ten business days after the expiration of the show cause response period, they should be forwarded to the Office of the Comptroller for collection and this docket may be closed administratively.

ATTACHMENT A

DOCKET NO. 991663-TX DECEMBER 9, 1999

SUZANNE FANNON SUMMERLIN ATTORNEY AT LAW

1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301 TELEPHONE (850) 656-2288 TELECOPIER (850) 656-5589

June 30, 1999

Mr. Rick Moses Bureau Chief Division of Communications Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Mr. Moses:

As you requested, I am providing the following summary of our meeting on Thursday, June 24, 1999, between Teleconex and the Commission Staff. As you recall, Teleconex was represented in this meeting by Steve and Marilyn Watson and myself and the Commission Staff included yourself, Cathy Bedell, Elaine Johnson, Donna Clemons, and Ray Kennedy. Steve Watson is the owner of Teleconex, along with his wife, Marilyn, and his sons, Chris and Paul Watson.

In August 1998, Chris Watson of Teleconex first met Rick Austin and struck up a friendship. Mr. Austin proposed to become a master agent for Teleconex in the Melbourne, Florida, area. He stated he would organize agents to sell Teleconex's prepaid dial tone services through various entities such as Pak Mail stores, check cashing stores, etc., including his own check cashing company called "CIO" which stands for "Check It Out". As far as Teleconex can determine, Mr. Austin uses CIO and a company he created called "Family Phones" as marketing entities for the sale of prepaid telephone services. Mr. Austin began submitting orders to Teleconex on behalf of his agents in September 1998.

Before very long, Teleconex realized that Mr. Austin was not depositing the monies he was receiving from customers for Teleconex's services into Teleconex's account at the First Union Bank in Melbourne, Florida, as he was clearly expected to do. The arrangement had been set up to have all monies deposited into Teleconex's account and then Teleconex would send Mr. Austin the commissions he earned on the new customers he brought to Teleconex. Mr. Austin also misrepresented, without authorization from Teleconex, that he was an officer of Teleconex to many entities, including advertising agencies, banks, and others, by which method he incurred substantial financial obligations that Teleconex is currently grappling with.

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At the point in March 1999 that Mr. Austin recognized that Teleconex expected immediate payment of the approximate \$74,000 in payments he had collected from customers for Teleconex's services (and this amount includes no commissions owed to Mr. Austin by Teleconex), Mr. Austin made an offer to purchase Teleconex. In the course of these discussions, it became clear that Mr. Austin had very poor credit and would be unable to carry through on any offer to buy Teleconex. At that point, Teleconex terminated its arrangement with Mr. Austin. Mr. Austin was very unhappy that Teleconex was not interested in selling the company to him, as well as the fact that he knew he owed Teleconex approximately \$74,000 and would now have no arrangement by which to collect further payments and commissions from customers for Teleconex's services.

Mr. Austin soon entered into an arrangement with Pre-Cell Solutions, Inc., to sell Pre-Cell's prepaid dial tone services. Mr. Austin took the list of Teleconex's customers that he had in his possession and used this to target Teleconex's customers. He phoned Teleconex's customers and slandered Teleconex by telling these customers that Teleconex was bankrupt and unstable and about to go out of business. Mr. Austin told these customers that they were in danger of losing their telephone service if they stayed with Teleconex. Then Mr. Austin would offer the customers \$5.00 off of their monthly bill if they switched their service to Pre-Cell. This activity caused Teleconex grievous harm by causing customers to become upset and confused, as well as causing some customers to switch their service to Pre-Cell. In addition to this campaign against Teleconex through direct contacts with Teleconex's customers, Mr. Austin has waged a war against Teleconex by constantly sending the company threatening faxes, telling lies about Teleconex to the Florida Public Service Commission Division of Consumer Affairs, and by incurring numerous financial obligations using Teleconex's name and credit without authorization.

In an effort to defend itself against these actions by Mr. Austin (and thus, CIO, Family Phones, and/or Pre-Cell), Teleconex sent its customers a notice informing them it had become aware that another company was making calls to its customers stating Teleconex was bankrupt, unstable and going out of business. In the notice, Teleconex told its customers that these statements were untrue and, if they had received such a call, they should call the Florida Public Service Commission and complain. Teleconex also told its customers they should call Teleconex's business office to straighten out any problem with their service resulting from these calls. Subsequently, Teleconex received many phone calls from upset customers and Teleconex responded to these calls. **Teleconex has never initiated calls to its customers on this topic.** It has only responded to customer inquiries.

It is necessary to respond to Mr. Austin's claim that Teleconex disconnected Mr. Austin's telephone services. Teleconex had initially set up several 800 lines for its own use. At the beginning of the relationship between

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Teleconex and Mr. Austin, Mr. Austin was permitted to use some of these lines for his local service in Melbourne, Florida. When Teleconex terminated its relationship with Mr. Austin, Teleconex transferred these 800 lines back to Teleconex's own use.

Teleconex has determined that Mr. Austin, CIO, Family Phones and/or Pre-Cell have lured some customers away from Teleconex, but then failed to timely convert their service. Therefore, when Teleconex made its routine courtesy calls to customers for whom they had not received payment, and the customers confirmed that they had no desire to remain with Teleconex because they had signed up with a new provider, Teleconex ended up disconnecting customers that believed they had switched to CIO, Family Phones, or Pre-Cell. Teleconex did not know, and was not responsible to assure, whether these customers had in fact been converted to a different provider. CIO, Family Phones, Pre-Cell and/or Mr. Austin blamed Teleconex for this disconnection of service when, in fact, the customers might have paid CIO, Family Phones, Pre-Cell and/or Mr. Austin but CIO, Family Phones, Pre-Cell and/or Mr. Austin had failed to transfer their service in a timely manner.

Several customers have communicated to Teleconex that someone called them, saying they were from CIO, Family Phones and/or Pre-Cell, to attempt to get their business by stating that Teleconex was in bad financial shape and was going out of business. Attached are several customer letters as examples of this. This raises the issue of the inappropriate representation of Family Phones or CIO as a "telephone company".

Teleconex has filed a lawsuit against Mr. Austin and CIO, which was filed approximately one-half hour after a lawsuit was filed by Mr. Austin and CIO against Teleconex. Teleconex is also pursuing possible remedies with the Florida Attorney General.

Subsequent to our meeting, you sent a list of customers that Mr. Austin had provided to you as representing his customers (presumably Pre-Cell's customers). Enclosed is a copy of three pages of that list of customers. Because this effort to trace customers is so time-consuming, Mr. Watson has investigated the customers listed on just the first three pages to illustrate the situation. All customers marked with an asterisk are former Teleconex customers that were targeted by Mr. Austin as CIO, Family Phones and/or Pre-Cell.

As an update, Teleconex was contacted by one of its customers (using resold Sprint local service) who reported she received a call Friday evening, June 25, 1999, from an individual from Pre-Cell telling her that Teleconex was unstable and going bankrupt and that she needed to switch her service to their company. She refused and called Teleconex. I have spoken directly with this

lady. She is willing to sign an affidavit to this effect. I will send it to you as soon as I receive it.

As you can see, although this can be characterized as a "dispute between two companies," it is a problem that has negatively affected the customers a great deal. Teleconex has not caused this problem. Teleconex has tried very hard to limit the harm to its customers that Mr. Austin and CIO and/or Pre-Cell have inflicted. Teleconex has suffered tremendous financial and reputation damage from these actions by Mr. Austin, CIO, Family Phones, and/or Pre-Cell. This is not to mention the severe emotional stress the whole situation has caused the owners of Teleconex, the Watson family. Thank you for any assistance you can offer as a member of the Staff of the Florida Public Service Commission to resolve this matter.

Sincerely.

Suzanne F. Summerlin

SFS/wd Attachments (2) cc: Cathy Bedell, Esq. Elaine Johnson Ray Kennedy Donna Clemons, Esq. Steve and Marilyn Watson



DOCKET NO. 991663-TX DECEMBER 9, 1999 **Pre-cell/Family Phone Services**

ATTACHMENT B

Tel: 1-877-205-2417 Fax: 1-877-205-8803

Customer Number: 148 Service Phone Number: (407) 290-5628

JACQUELINE LAWRENCE 3916 MAGNOLIA LAKE LN

ORLANDO, FL 32810

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If payment is not RECEIVED at our office for credit before 5 p.m. eastern time on

11/10/1999

your phone service shall be disconnected and an additional \$25.00 fee will be required before reconnecting your phone service. Please mail your payment promptly to avoid this inconvenience and additional charge. CIO Family Phone Services 2350 Commerce Park Dr. Suite #3 Palm Bay, FL 32905

Phone Service Package: Family Fun Package

Payment Due Date: 11/05/1999

Itemized Charges for Next Billing Period: Phone Service Base Fee: \$51.33 FCC Approved Line Fee: \$ 3.50 FL Telecom. Relay Service: \$ 0.12 Pre-Cell Long Distance Access Fee: \$0.00 Pre-Cell non-Published Service fee: \$0.00 Subtotal: \$54.95 911 Service Fee: \$ 0.50 Federal Excise Tax (3.0%): \$1.54 Gross Receipts Tax (2.5%): \$1.28 State and Local Taxes: \$8.42 Previous Balance: \$0.00 Note: If the Previous Balance is within permutants, i.e. (\$2.25), then it reflects a previous balance due Total Amount Due; \$64.69

When sending payment, you MUST INCLUDE your telephone number or customer number ON THE CHECK. Your prompt payment is appreciated.

Make Check or Money Order Payable to:

CIO Family Phone Services 2350 Commerce Park Dr. N.E. Suite #3 Paim Bay, FL 32905

For BILLING inquiries please call 1-877-205-2417 ext. 5 To report REPAIR problems, call 1-877-205-2417 ext. 6

Please be advised;

The customer is responsible for ALL CHARGES incurred by use of phone features not specifically included with the subscribed service. Le. directory essimance.

Tear of bottom and submit with your payment, keep the top portion for your records.

Customer Number: 148 Service Phone Number: (407) 290-5628 Total Amount Due: \$ 84.69 Payment Due Date: 11/05/1999

Make Check or Money Order Payable to:

CIO Family Phone Services 2350 Commerce Park Dr. N.E. Suite #3 Pulm Bay, FL 32905 DOCKET NO. 991663-TX DECEMBER 9, 1999

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FAMILY PHONE

ATTACHMENT C

255 East Drive, Suite C., Melbourne, Fl (407)728-7374 FAX (407) 729-8484

Dear Valued Customer:

We are no longer working with the company that was collecting our payments.

Please make sure all payments are made.

By money order to:

PRECELL / FAMILY-PHONE 255 East Drive, Suite C Melbourne, Fl. 32904

To Western Union. You can call 1-800-325-6000 to find the payment center nearest to you. The code is "Family Phone".

We will be sending you a bill in the next few days for October. If you have paid us at the above address, thank you and your November bill will reflect that payment. If you have paid CIO you must send us a copy of that payment, either cancelled check, money order receipt or credit card receipt, along with a copy of CIO's bill.

THIS IS VERY IMPORTANT. WE CAN NOT GUARANTEE THAT YOU WILL RECEIVE CREDIT IF YOU PAY THE OLD COMPANY OR MAKE A PAYMENT TO ANY OTHER PAYMENT CENTER THAN THOSE LISTED HERE. PLEASE CALL AT YOUR EARLIEST CONVENIENCE SHOULD YOU HAVE ANY QUESTIONS. WE HAVE ENCLOSED A COPY OF OUR PUBLIC UTILITY COMMISSION LICENSE TO CONFIRM TO YOU OUR LICENSE.

PRECELL / FAMILY PHONE GENERAL PRICING: (Does not include taxes)

Basic Plan w/ call waiting	\$ 44.95
Basic Plan w/ Call Waiting & LD access	\$ 49.95
Family Fun Package Complete	\$ 54.95

We look forward to serving you and we apologize for any inconvenience this may have caused.

Sincerely.

Thomas E. Biddix CEO

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October 6, 1999

ATTN: ALL C.I.O., INC/ FAMILY PHONE SERVICE CUSTOMERS

• DEMONSTREED. IT HAS COME TO OUR ATTENTION THAT THERE IS A SCAM TAKING PLACE, OUR CUSTOMERS ARE BEING ASKED TO SEND THEIR PAYMENTS TO A BOGUS LOCATION. IF YOU SHOULD HAVE THIS HAPPEN TO YOU'OR HAVE ANY QUESTIONS PLEASE CALL US IMMEDIATELYAT 1-877-205-2417. PAYMENTS FOR FAMILY PHONE SERVICES ARE STILL TO BE MAILED TO: 2350 COMMERCE PARK DR. NE SUITE 3 PALM BAY, FL 32909 1-877-205-2417 UNTILL FURTHER NOTICE WE ARE NO LONGER USING WESTERN UNION, SO PLEASE CALL US IF YOU NEED ANY INFORMATION REGARDING LOCATIONS FOR OUR PAY AGENT. THANK YOU.

RHONIDA BURNSTEIN WOLF

RHONDA BURNSTEIN WOLF GENERAL MANAGER

PHONE 1-877-205-2417 FAX 1-877-202-8803 C.I.O.@BELLSOUTH.COM

2350 COMMERCE PARK DR. N.E. SUITE 3 PALM BAY, FLORIDA 32905

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DOCKET NO. 991663-TX DECEMBER 9, 1999

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ATTACHMENT E

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321	727 1	8327 034	*9@2*	OCT O	1999	4.1	7E±		E MELI	1FB
CIO]	ine di	BA FAMILI	r		MT	DUE	13	332.69		
DATE	TYPE	NOTATIO	ß					FU	ACT	USERID
1001	DAT	NEW SYC	IN NF	904 30	50007	491	SHAK	#ND81MD CLEC	***	SQ20JRC1
1001	DAI	NEV SVC	IN NF	964 783	3-2397	464	SHAK	#NBHFCK ULEC		SQ20JRC1
0930	IDAT	NEV SVC	IN SE	561 873	3-1645	565	SHAK	#NOP4LC CLEC		S0200FS1
0930	DAT	NEW SVC	IN NF	904 66	5-0055	119	SHAK	#NGCSIDE D		SQ20JRC1
								#N21616 Disc		SQ20JRC1
								#N75MOB Disc		SQ20JRC1
0930	IMAT	NEV SVC	IN NF	407 984	1-9880	916	SHAK	#NHELJFT H waing		SQ20JRC1
0930	IMAT	NEV SVC	IN NF	9 94 35	8-9046	549	SHAK	#N12KDGLEC		SQ20JRC1
0930	IMAT	NEV SYC	IN NF	407 674	1-0376	692	SHAK	#N4445B)		SQ20JRC1
0929	DAT	NEV SYC	IN SE	561 49	3-1707	615	SHAK	*N9N3K6CLEC		SQ2UNF51
0929	DEAT	NEV STC	IN NF	904 59	5-0036	309	SHAK	IN49KODISC		SQ20JRE1
		NEV SYC						INSEME Disc		SQ20JRC1
								*N7BFUPCLEC		SQ20JRC1
0928	DAI	NEW SVC	IN NF	704 Z4	7-2255	020	SHAK	AND CLEC		SQ20JRC1
								*NB955FCLEC		SQ20JRC1 SQ20DRC1
								*NFXSYPDise		SQ20JRC1
0928	INVAT	NEW SVC	IN NF	904 38	7-9994	435	SHAK	#N2CH33 Dis C #N6Chgb Disc		SQ20JRC1
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CID INC HEA FAMILY AND DUE 1332.69	1
DATE TYPE NOTATIONS	
	FU ACT USERID
1006 IVAI NEV SVC IN NF 904 448-6587 635 SHAK #NUVE	MKC *** SQ20JRC1
1006 DOAT NEW SYC IN NF 407 688-0876 648 SHAK #N748	Ke) *** \$026 TRe1
lund luat new SVC IN NF 407 854-4955 106 seak engry	KTD *** S0201RC1
1005 IRAI NEW SVC IN NF 904 726-8277 776 SHAK #NF7M	14D *** soon met
1005 IGAT NEW SVC IN NF 904 731-5497 235 SHAK ±N5KG	48 D *** \$820,70c1
1005 DIAI NEW SVC IN NF 407 725-2333 544 SHAK #N51T	57 D *** S020 TPC1
1004 LIAJ NEV SVC IN NF 407 727-3953 332 SHAX ±NTERN	70C *** 5020 mpr1
LUU4 DAI NEV SVC IN NF 407 768-0404 111 SHAK INAHT	FYD *** SO20TRe1
LULIA IDIAT NEV SVC IN NF 904 634-0018 710 SHAK #NRHR	
1004 DAT NEW SVC IN NF 904 398-9190 951 SHAK #NKGR	WT) *** CO90 TRe1
LULIA IDIAI NEV SVC IN NF 4 67 812-4707 436 SHAK ENFYT	TUD *** 5098 mm1
1004 IPAT NEW SYC IN SE 561 286-4780 645 SHAK INSRG	18 D *** cn900cct
LUUA IDAI NEV SYC IN NF 904 317-8306 484 SHAK INGUR	
1001 IDAI NEW SVC IN NF 904 781-0916 720 SHAK #NEHE	MID *** SQ20JRC1
1001 IMAT NEW SVE IN NF 407 956-8445 286 SHAK #N40C	B2 D *** SQ20JRC1
UBI IMAT NEW SVC IN NF 904 743-7344 334 SHAK INARG	
001 DGAT NEW SVC IN NF 407 984-2206 336 SHAK #N626	JF D *** SQ20JRC1
1001 IMAT NEW SVC IN NF 904 908-9355 390 SHAK #NG41	67) *** S Q20JRC1
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ALTACHMENT	321 727 8327 034 *70201* OCT 01 1999 *1.IVE*	E MELB 1FB
A	CIO INC IBA FAMILY PB 031 STA TAK NNNN	CC B MCC0 C3148
	PHINE SERVICES CIO RA RIA TAR 036702 THE 9 0	
	2350 COMPERCE PK UR HB N23 NT AVI 85 DEP -0 NESUIT 3 PPD CCH AMI DUE 1332.69	
	MELB FL 32905 CI C P-RICHARD AUSTIN R4077331459NUBS	TXID 59-3538555 P98
	000088757 UK TO SPK WITH RHUNDA BERSTEIN, SHERRI & RICHARD	
	(BSUM) SS;N UNNE C BINX	FE P3N 80258 M
	IC 3/0198 2/0101 P/0142 TRT 000000005700 RCK 0000000000 LB 1661.46 BAL 0.00 CC 1332.69 TOT 1332.69 L1	
		EB 135.44
		EN 1197.25
	F	U ACT USERID
	1007 IMAI NEW SVC IN NF 904 819-0089 787 SHAK #N00989°C	*** SQ20JRC1
	1007 INAT NEW SVC IN SE 561 460-3883 631 SHAK #N10007C	*** SQ2000FS1
	1006 DAAT NEV SVC IN NF 407 737-7255 382 SHAK #N7458LH	*** SQ20JRC1
	1006 DUAT NEW SVC IN NF 904 475-0034 150 SHAK #N1274H D	*** SQ20JRC1
	1006 IDAT NEW SVC IN SE 561 464-8415 283 SHAK #N7YJ56) 1006 IDAT NEW SVC IN NF 407 953-2171 005 SHAK #N59RF3)	*** SQ20MFS1 *** SQ20JRC1
	1006 DUAT NEW SVC IN NF 904 722-0006 685 SHAK #N0812D D	*** SQ20JRC1
1999	1006 DEAT NEW SVC IN NF 904 766-0888 303 SHAK #N324RT D	*** SQ20JRC1
1999	1006 IMAT NEW SVC IN NF 407 952-5792 582 SHAK #N2GBYR)	*** SQ20JRC1
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