MCNAIR
ATTORNEYS

Margaret M. Fox

pfox@mcnair.net
T (803) 799-9800
F (803) 753-3278

August 19, 2014

Ms. Jocelyn Boyd
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of South Carolina Telecommunications Group Holdings LLC, d/b/a Spirit Communications for a Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services, and for Flexible and Alternative Regulation
Docket No. 2014-276-C

Dear Ms. Boyd:

Enclosed for filing on behalf of South Carolina Telecommunications Group Holdings, LLC, d/b/a Spirit Communications, please find the Motion For Expedited Review in the above-referenced matter.

Thank you for your assistance.

Very truly yours,

McNAIR LAW FIRM, P.A.

Margaret M. Fox

Margaret M. Fox

MMF:hme
Enclosures

cc: Mike Baldwin, Esquire, Spirit Communications
Parties of record

McNAIR LAW FIRM, P.A.
1221 Main Street
Suite 1600
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

COLUMBIA 1174716v1

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2014-276-C

IN RE:

Application of South Carolina Telecommunications Group Holdings, LLC, d/b/a Spirit Communications for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange and Interexchange Telecommunications Services, and for Flexible Regulation of its Local Exchange Services and Alternative Regulation of its Interexchange Service Offerings Within the State of South Carolina	)

MOTION FOR EXPEDITED REVIEW

South Carolina Telecommunications Group Holdings, LLC, d/b/a Spirit Communications ("Spirit") hereby respectfully moves for expedited review of its application for a Certificate of Public Convenience and Necessity to provide resold and facilities-based local exchange and interexchange telecommunications services in those areas in the State of South Carolina. By its application, Spirit proposes to offer local exchange services within the present operating areas of BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T"), Frontier Communications of the Carolinas, Inc. ("Frontier"), United Telephone Company of the Carolinas, Inc. d/b/a CenturyLink ("CenturyLink"), and Windstream South Carolina, LLC ("Windstream"). Interexchange services will be offered throughout the State of South Carolina. Spirit also requests flexible regulation for its local exchange service offerings and alternative regulation of its interexchange service offerings.

Spirit requests that this matter be decided by the Commission at the Commission's earliest opportunity in a regularly-scheduled agenda session, and that the Commission cancel the formal hearing on this matter, which is currently scheduled for September 22, 2014. This motion is made on the following grounds:

1. Spirit published notice of the filing of the request in a newspaper of general circulation, as required by the Commission. The deadline to intervene in this matter was August 11, 2014.

2. The South Carolina Office of Regulatory Staff ("ORS") is a statutory party to this action. See S.C. Code Ann. § 58-4-10(B). On August 13, 2014, ORS filed a letter in this docket stating that it does not oppose the Commission granting Spirit's Application. Spirit's counsel has consulted with counsel for ORS, and ORS does not object to proceeding without a formal hearing in this matter.

3. No other comments or petitions to intervene were received in response to the notice. Thus, all interested persons have been afforded an opportunity for a hearing, as required by S.C. Code Ann. § 58-9-280(B), Section 1-23-320(a) of the South Carolina Administrative Procedures Act, and constitutional due process. Proceeding without a formal hearing in this matter would serve the public interest in administrative efficiency.

4. Spirit is a private company that was organized in the state of South Carolina on December 29, 2000. Spirit is the sole owner of South Carolina Net, Inc. ("SC Net"), a South Carolina corporation, also located at 1500 Hampton Street, Columbia, SC 29201. SC Net currently holds Certificates of Public Convenience and Necessity from the State of South Carolina. See Order No. 92-333 in Docket No. 92-113-C (May 13, 1992) (granting certificate to operate as a reseller of intrastate, interLATA service in the State of South Carolina); Order No. 2000-549 in Docket No.

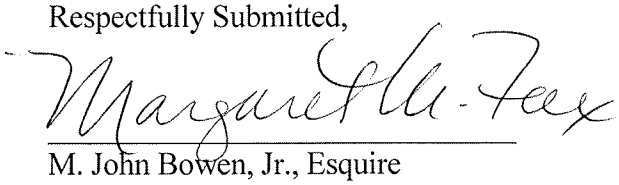
2000-121-C (July 5, 2000) (granting certificate to provide local exchange services in area of the State served by BellSouth (now AT&T), GTE South (now Frontier), and United Telephone (now CenturyLink)); see also Order No. 2003-346 (amending certificates to add Spirit Telecom d/b/a). SC Net has been providing long distance services in the State since 1992 and local exchange services in the State since 2000. Spirit is in the process of restructuring its business so that some of the local and long distance services it offers will be provisioned directly through Spirit. SC Net will continue offering these services as well. The certificates previously granted to SC Net were granted upon a finding by the Commission that SC Net has the technical, financial, and managerial resources sufficient to provide the requested services within the State of South Carolina, and that SC Net meets all other requirements of certification. As SC Net's parent company, Spirit likewise meets these requirements, as demonstrated in the Profiles of Company Officers attached as Attachment C to the Application, Spirit's most recent Annual Report filed with the Commission and attached as Attachment D to the Application, and the verified Testimony of Michael D. Baldwin, filed in the above-captioned docket on August 11, 2014. The Commission is familiar with the operations and standing of Spirit and its affiliated companies.

5. Mr. Baldwin's verified testimony in this docket, and the Attachments filed with the Application, demonstrate that the relief requested in the Application is warranted and that approval of the Application is in the public interest.

WHEREFORE, for the reasons stated above, South Carolina Telecommunications Group Holdings, LLC, d/b/a Spirit Communications, respectfully requests that the Commission grant its request for expedited review of its application for a Certificate of

Public Convenience and Necessity in this matter, and that the Application be approved at the Commission's earliest convenience.

Respectfully Submitted,



M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
Telephone: (803) 799-9800
Facsimile: (803) 753-3278
Email: jbowen@mcnair.net; pfox@mcnair.net

Attorneys for South Carolina Telecommunications Group Holdings, LLC, d/b/a Spirit Communications

August 19, 2014

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Docket No. 2014-276-C

Application of South Carolina Telecommunications Group Holdings LLC, d/b/a Spirit Communications for a Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services, and for Flexible and Alternative Regulation	)

CERTIFICATE OF SERVICE

I, Heather M. Elder, do hereby certify that I have this date served one (1) copy of the Motion For Expedited Review on behalf of South Carolina Telecommunications Group Holdings LLC, d/b/a Spirit Communications in the above-referenced docket upon the following parties causing said copy to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

Heather M. Elder, Legal Assistant
McNair Law Firm, P. A.
P. O. Box 11390
Columbia, South Carolina 29211

August 19, 2014

Columbia, South Carolina