BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2012-253-C

IN RE: Petition of the Office of Regulatory Staff for Commission to Order a Rule To Show Cause as to Why the Certificates of Public Convenience and Necessity for Certain Providers of Telecommunications Services Should Not Be Revoked	))))))	**PETITION OF THE OFFICE OF REGULATORY STAFF FOR A RULE TO SHOW CAUSE**

The Office of Regulatory Staff, by filing this petition, would respectfully show and request of the Commission that:

1. The Public Service Commission of South Carolina ("the Commission") is a state agency constituted pursuant to the laws of the State of South Carolina with its business offices located in Columbia, South Carolina. Further, the Commission is responsible for the regulation of telephone utilities operating for compensation as set forth in S.C. Code Ann. §58-9-10 et seq. (Supp. 2011).

2. The Office of Regulatory Staff ("ORS") is charged with the duty to protect the public interest pursuant to S.C. Code Ann. §58-4-10, et seq. (Supp. 2011).

3. The Telecommunications Companies ("Companies") listed in Exhibit A are certificated "telephone utilities" as defined in S.C. Code Ann. §58-9-10(6) (1976) in that they are persons or corporations, their lessees, assignees, trustees, receivers or other successors in interest owning or operating in this State equipment or facilities for the transmission of intelligence by telephone for hire, including all things incident thereto and related to the operation of telephones.

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4. The Companies listed in Exhibit A are subject to the jurisdiction of this Commission pursuant to S.C. Code Ann. §58-9-710 et seq. (Supp. 2011). Further, they have submitted themselves to the jurisdiction of the Commission by their holding a Certificate of Public Convenience and Necessity as indicated in Exhibit A.

5. The Telecommunications Companies listed in Exhibit A, were granted authority to provide local exchange services. Upon receiving their Certificates of Public Convenience and Necessity, these companies were found to possess the technical, financial, and managerial resources sufficient to provide the services requested. S.C. Code Ann. § 58-9-280(B) (1) (Supp. 2011).

6. Pursuant to 26 S.C. Code Ann. Regs. 103-607 (Supp. 2011), the telephone utilities subject to the Commission's jurisdiction providing residential local exchange that have less than $5,000,000 invested in plant are required to file a bond with Commission.

7. Despite two separate notifications, the Companies listed in Exhibit A have failed to comply with Regulation 103-607.

8. Several carriers listed in Exhibit A requested and received a partial waiver of the requirements of Regulation 103-607 and were required to post a bond in accordance with a formula set out in Commission Order No. 2012-175. However, these carriers have not filed a bond consistent with the requirements of Order No. 2012-175.

9. ORS has the responsibility to ensure that telephone utilities are compliant with the Commission's orders, directives, and regulations.

10. The information for the business entities listed in Exhibit A accurately reflects the information on file with the South Carolina Secretary of State. See Exhibit B, Affidavit of James McDaniel.

11. "Each telephone utility shall obey and comply with each and every requirement of every order, decision, direction, rule or regulation made or prescribed by the Commission and every direction, rule or regulation made or prescribed by the Office of Regulatory Staff in the performance ... or in relation to any other matter in any way relating to or affecting the business of such telephone utility and shall do everything necessary or proper in order to secure compliance with and observance of every such order, decision, direction, rule or regulation by all of its officers, agents and employees." S.C. Code Ann. § 58-9-390 (Supp. 2011).

12. Pursuant to S.C. Code Ann. §58-9-1120 (Supp. 2011), "the Commission may ... conduct such other hearings as may be required in the administration of the powers and duties conferred by Articles 1 through 13 of this chapter and by other laws relating to telephone utilities."

WHEREFORE, the ORS prays that the Honorable Commission:

1. Enter an order establishing a Rule to Show Cause instituting a formal proceeding against the persons and business entities listed in Exhibit A.

2. For the persons and business entities listed in Exhibit A, pursuant to 26 S.C. Code Regs. 103-830, cause a copy of this petition to be served upon such named respondents or other proper person or entity.

3. Require the parties to submit an Answer to this Petition within the deadlines prescribed by the Commission's rules and regulations.

4. Schedule and conduct a formal administrative hearing to address disputed issues of fact and law regarding the Certificate pursuant to S.C. Code Ann. §58-9-820 (Supp. 2011).

5. Find that the Companies listed in Exhibit A have not complied with orders, decisions, directions, rules and regulations made or prescribed by the Commission.

6. Enter a final order canceling the local exchange Certificates held by the Companies listed in Exhibit A.

7. Take other appropriate action which the Commission may deem necessary.

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
Telephone: (803) 737-0800
Fax: (803) 737-0895

June 25, 2012
Columbia, South Carolina

OrganizationName	Registered Agent	Secretary of State status	Foreign or Domestic	Docket #	Order #[1]	Date Certificate Issued
Affinity Network, Inc. **DBA Quantum Link Co./VOIP Communications/Optic Communications/ANI Networks** Jessica Renneker -Director Regulatory Affairs 250 Pilot Rd, Ste 300 Las Vegas NV 89119	National Registered Agents, Inc. 2 Office Park Court, Ste 103 Columbia SC 29223	Foreign	Good Standing	2000-230-C	2000-732	9/5/2000
Birch Communications, Inc. Angela Hoke - Manager-Legal & Regulatory 2300 Main Street, Suite340 Kansas City MO 64108	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	1999-323-C	1999-801	11/15/1999
Birch Telecom of the South, Inc. **Birch Telecom DBA Birch DBA Birch Communications** Angela Hoke - Manager-Legal & Regulatory 2300 Main Street, Suite340 Kansas City MO 64108	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	2000-265-C	2000-792[1]	9/25/2000
BT Communications Sales, LLC Lynette Justice - Regulatory Affairs-TMI PO Drawer 200 Winter Park FL 32790-0200	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	1999-163-C	1999-593[1]	8/24/1999
Capital Communications Consultants, Inc. Candice Pair - Regulatory Officer 7470 Bartlett Corporate Cove W, Ste 102 Bartlett TN 38133	Incorp Services Inc 317 Ruth Vista Rd Lexington SC 29073	Foreign	Good Standing	2010-349-C	2011-94[1]	1/26/2011
ComTech21, LLC Michael Brady - EVP One Barnes Park, South Wallingford CT 06492	Incorp Services Inc 317 Ruth Vista Rd Lexington SC 29073	Foreign	Good Standing	2004-54-C	2004-312	6/30/2004
Covista, Inc. Mark Lammert - CPA., P.A./Compliance Solutions Inc 740 Florida Central Pkwy, Ste 2028 Longwood FL 32750	***AGENT RESIGNED***	Foreign	Good Standing	2003-200-C	2003-594	10/3/2003
dPi Teleconnect, LLC Melanie King - Regulatory Affairs Mgr 1330 Capital Pkwy Carrollton TX 75006-3647	C T Corporation System 75 Beattie Place Two Insignia Financial Plaza Greenville SC 29601	Foreign	Dissolved	1998-640-C	1999-228	3/30/1999
Ernest Communications, Inc. Mark Lammert - CPA.,P.A./Compliance Solutions Inc. 740 Florida Central Pkwy, Ste 2028 Longwood FL 32750	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Reinstatement	2001-447-C	2002-90	2/6/2002
EveryCall Communications, Inc. **DBA All American Home Phone DBA Local USA** Judity Riley - President PO Box 720128 Oklahoma City OK 73172-0128	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Good Standing	2003-297-C	2004-47[1]	1/30/2004

Flatel, Inc. **DBA Telephone USA** Adriana Solar - CFO 2300 Palm Beach Lakes Blvd. Executive Center Ste 100 West Palm Beach FL 33409	Oscar Garcia 6300 White Horse Rd #118 Greenville SC 29611	Foreign	Forfeiture	1999-515-C	2000-380	4/26/2000
Genesis Telecommunications Company, LLC Barbara Bennett - General Manager PO Box 675 Greenwood SC 29648	John Lawrence 1117 Reynolds Ave Greenwood SC 29646	Domestic	Good Standing	2000-350-C	2000-873[1]	10/27/2000
Global Connection Inc. of America Ms. Angela Briggs - Paralegal 5555 Oakbrook Pkwy, Ste 620 Norcross GA 30093	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	2000-149-C	2000-580	7/19/2000
Global NAPS South Carolina, Inc. Larry Cross - Regulatory Officer 1120 Hancock St Quincy MA 02169-4313	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Forfeiture	2001-503-C	2002-258[1]	4/10/2002
Granite Telecommunications, LLC Geoffrey Cookman - Dir. Regulatory, Tax Department 100 Newport Avenue Ext. Quincy MA 02171	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	2002-269- C	2002-824[1]	12/6/2002
Image Access, Inc. **DBA New Phone** Jim Dry - President 5555 Hilton Ave Ste 415 Baton Rouge LA 70808	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Reinstatement	1999-269-C	1999-762	10/26/1999
iNetworks Group, Inc. Agnes Rivera - Manager of Tax 125 S Wacker Dr, Ste 2510 Chicago IL 60606	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Good Standing	2009-164-C	2009-553	8/6/2009
Lightyear Network Solutions, LLC Heather Pickett - Sr. Tax Accountant 1901 Eastpoint Pkwy Louisville KY 40223	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Good Standing	2003-369-C	2004-550[1]	11/8/2004
Matrix Telecom, Inc. **DBA Matrix Business Technologies** Kimberly Geuder - Compliance Reporting Specialist-TMI PO Drawer 200 Winter Park FL 32790-0200	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Good Standing	2005-98-C	2005-449	8/25/2005
Navacore, LLC Thomas K. Gwyn - Partner PO Box 3413 Rock Hill SC 29732	Thomas K. Gwyn 2354-B Ebenezer Rd Rock Hill SC 29732	Domestic	Good Standing	2006-111-C	2006-468[1]	8/4/2006

Navigator Telecommunications, LLC Renee Bethea - Tax Accountant PO Box 13860 North Little Rock AR 72113-0860	National Corporate Research, Ltd. 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Good Standing	1999-176-C	1999-572[1]	8/11/1999
Nexus Communications Mark Lammert - CPA.,P.A./Compliance Solutions Inc 740 Florida Central Pkwy, Ste 2028 Longwood FL 32750	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	2004-59-C	2004-421	9/3/2004
Pac-West Telecomm, Inc. James Mertz - Regulatory Affairs 4550 Lakefield Bend Berkeley Lake GA 30096	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign	Good Standing	2010-411-C	2011-318[1]	4/26/2011
Ring Connection, Inc. Holley Burlison - General Manager PO Box 520 Crestview FL 32536-0535	Tammy M. Fielder 1701 Laurens Rd, Ste A Greenville SC 29607	Foreign	Good Standing	2002-92-C	2002-503	7/8/2002
Tele Circuit Network Corporation Lisa Brown - Regulatory & Tax Consultants, LLC 3100 Breckinridge Blvd, Ste 145 Duluth GA 30096-5800	TCS Corporate Services, Inc. 2 Office Park Ct, Ste 103 Columbia SC 29223	Foreign	Forfeiture	2008-398-C	2009-434[1]	6/18/2009
Telecom Services of the Low Country, LLC Walter Gnann - President 2121 Boundary Street, Suite 108 Beaufort SC 29902-6812	Walter N Gnann, Jr. 14 Savanah Hwy, Ste 14 Beaufort SC 29906	Domestic	Good Standing	2003-274-C	2004-403[1]	8/26/2004
Tennessee Telephone Service, LLC **DBA Freedom Communications USA, LLC** Matt Davis - General Manager 220 Creekside Dr Dickson TN 37055	**AGENT RESIGNED**	Foreign	Good Standing	2004-211-C	2004-567[1]	11/15/2004
Trans National Communications International, Inc. Stella Gnepp - Reg. Affairs Specialist 2 Charlesgate West Boston MA 02215	National Registered Agents, Inc. 2 Office Park Court, Ste 103 Columbia SC 29223	Foreign	Reinstatement	2001-316-C	2001-1044[1]	11/7/2001
Velocity The Greatest Phone Company Ever, Inc. Nancy Malley - Preparer-BillSoft Services, Inc. 8675 W 96th St, Ste 220 Overland Park KS 66212	National Registered Agents, Inc. 2 Office Park Court, Ste 103 Columbia SC 29223	Foreign	Forfeiture	2009-380-C	2010-1[1]	1/6/2010
West Communications, Inc. Edward Johnson - President/CEO 2117-B W Palmetto St, Ste 202 Florence SC 29501	Corporation Service Co. 1703 Laurel St Columbia SC 29201	Foreign/ Domestic	Good Standing	2003-336-C	2004-102	3/12/2004
Wholesale Carrier Services, Inc. Rosa Clark - Compliance Analyst 5471 N University Dr Coral Springs FL 33067	**AGENT RESIGNED**	Foreign	Good Standing	2002-23-C	2002-365[1]	5/13/2002

[1] ***Carriers were granted CLEC and IXC authority in one PSC Order. ORS requests revocation of CLEC authority only.***

EXHIBIT B

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2012- -C

June 22, 2012

IN RE: Petition of the Office of Regulatory Staff for Commission to Order a Rule To Show Cause as to Why the Certificates of Public Convenience and Necessity for Certain Providers of Telecommunications Services Should Not Be Revoked	))))))	**AFFIDAVIT OF JAMES M. MCDANIEL**

The Affiant, after having been first duly sworn, deposes and states as follows:

1) My name is James M. McDaniel and I am employed by the Office of Regulatory Staff ("ORS") as the Program Manager.

2) My office is located at 1401 Main Street, Columbia, South Carolina, 29201

3) I and/or personnel under my direction researched the South Carolina Secretary of State's website in order to determine the corporate status of the business entities listed in Exhibit A of this petition.

4) I attest that, to the best of my knowledge, the corporate statuses of the business entities listed in Exhibit A are accurate.

AND FURTHER THE AFFIANT SAYETH NOT.

JAMES M. MCDANIEL
Program Manager
Telecommunications Area
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

Sworn and subscribed before me
this 22nd day of June, 2012

Notary Public for South Carolina
My Commission Expires: 4/23/2017

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2012- -C

IN RE: Petition of the Office of Regulatory Staff for Commission to Order a Rule To Show Cause as to Why the Certificates of Public Convenience and Necessity for Certain Providers of Telecommunications Services Should Not Be Revoked	)	**CERTIFICATE OF SERVICE**

This is to certify that I, Faith E. Shehane, have this date served one (1) copy of the **PETITION FOR A RULE TO SHOW CAUSE** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

PLEASE SEE NEXT PAGE FOR LIST OF PARTIES SERVED

Faith E. Shehane

June 25, 2012
Columbia, South Carolina

OrganizationName	Registered Agent
Affinity Network, Inc. **DBA Quantum Link Co./VOIP Communications/Optic Communications/ANI Networks**	National Registered Agents, Inc. 2 Office Park Court, Ste 103 Columbia SC 29223
Birch Communications, Inc.	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Birch Telecom of the South, Inc. **Birch Telecom DBA Birch DBA Birch Communications**	Corporation Service Co. 1703 Laurel St Columbia SC 29201
BT Communications Sales, LLC	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Capital Communications Consultants, Inc.	Incorp Services Inc 317 Ruth Vista Rd Lexington SC 29073
ComTech21, LLC	Incorp Services Inc 317 Ruth Vista Rd Lexington SC 29073
Covista, Inc. Mark Lammert - CPA., P.A./Compliance Solutions Inc 740 Florida Central Pkwy, Ste 2028 Longwood FL 32750	***AGENT RESIGNED***
dPi Teleconnect, LLC	C T Corporation System 75 Beattie Place Two Insignia Financial Plaza Greenville SC 29601
Ernest Communications, Inc.	Corporation Service Co. 1703 Laurel St Columbia SC 29201
EveryCall Communications, Inc. **DBA All American Home Phone DBA Local USA**	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223
Flatel, Inc. **DBA Telephone USA**	Oscar Garcia 6300 White Horse Rd #118 Greenville SC 29611
Genesis Telecommunications Company, LLC	John Lawrence 1117 Reynolds Ave Greenwood SC 29646
Global Connection Inc. of America	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Global NAPS South Carolina, Inc.	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223

Granite Telecommunications, LLC	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Image Access, Inc. **DBA New Phone**	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223
INetworks Group, Inc.	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223
Lightyear Network Solutions, LLC	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223
Matrix Telecom, Inc. **DBA Matrix Business Technologies**	CT Corporation System 2 Office Park Ct, Ste 103 Columbia SC 29223
Navacore, LLC	Thomas K. Gwyn 2354-B Ebenezer Rd Rock Hill SC 29732
Navigator Telecommunications, LLC	National Corporate Research, Ltd. 2 Office Park Ct, Ste 103 Columbia SC 29223
Nexus Communications	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Pac-West Telecomm, Inc.	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Ring Connection, Inc.	Tammy M. Fielder 1701 Laurens Rd, Ste A Greenville SC 29607
Tele Circuit Network Corporation	TCS Corporate Services, Inc. 2 Office Park Ct, Ste 103 Columbia SC 29223
Telecom Services of the Low Country, LLC	Walter N Gnann, Jr. 14 Savanah Hwy, Ste 14 Beaufort SC 29906
Tennessee Telephone Service, LLC **DBA Freedom Communications USA, LLC** Matt Davis - General Manager 220 Creekside Dr Dickson TN 37055	**AGENT RESIGNED**
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Velocity The Greatest Phone Company Ever, Inc.	National Registered Agents, Inc. 2 Office Park Court, Ste 103 Columbia SC 29223
West Communications, Inc.	Corporation Service Co. 1703 Laurel St Columbia SC 29201
Wholesale Carrier Services, Inc. Rosa Clark - Compliance Analyst 5471 N University Dr Coral Springs FL 33067	**AGENT RESIGNED**