**BEFORE**

**THE PUBLIC SERVICE COMMISSION**

**OF SOUTH CAROLINA**

**DOCKET NO. 2012-253-C**

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

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

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

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

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

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|---|---|
| **Velocity The Greatest Phone Company Ever, Inc.** | National Registered Agents, Inc.<br>2 Office Park Court, Ste 103<br>Columbia SC 29223 |
| **West Communications, Inc.** | Corporation Service Co.<br>1703 Laurel St<br>Columbia SC 29201 |
| **Wholesale Carrier Services, Inc.**<br>Rosa Clark - Compliance Analyst<br>5471 N University Dr<br>Coral Springs FL 33067 | **AGENT RESIGNED** |