

**GLOBAL CONNECTION INCORPORATED OF
AMERICA**

3957 Pleasantdale Road, Atlanta, GA 30340

Phone: 678.966.8444 / fax: 770.458.6773

Missouri Public Service Commission
Cully Dale, Executive Secretary
P.O Box 360
Jefferson City, Missouri. 65102

FILED

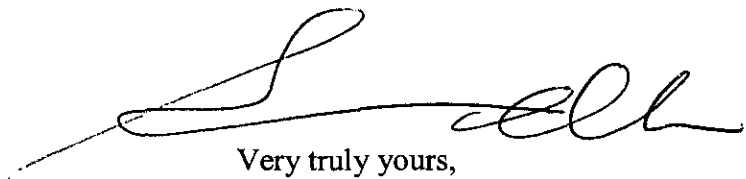
May 25, 2007

Missouri Public
Service Commission

**The application of Global Connection Inc. of America. for designation as an
eligible Telecommunications carrier pursuant to Section 214(e)(2) of the
Communications Act of 1934**

Dear Mrs. Dale:

Enclosed for filing in the above-referenced docket is an original and (8) eight copy of Global Connection Inc. of America's Application for Designation as an Eligible Telecommunications Carrier.



Very truly yours,

Global Connection, Inc. of America
President and Owner
Houssam Abdallah
May 24, 2007

**GLOBAL CONNECTION INCORPORATED OF
AMERICA**

3957 Pleasantdale Road, Atlanta, GA 30340

Phone: 678.966.8444 / fax: 770.458.6773

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

**PETITION FOR DESIGNATION AS AN ELIGIBLE
ELECOMMUNICATIONS CARRIER IN THE STATE OF MISSOURI**

Global Connection Incorporated of America, pursuant to Section 214(e)(2) and Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act") ¹ and Sections 54.101 through 54.207 of the Rules of the federal Communications Commission ("FCC"), ² and 4 CSR 240-3.570 hereby petitions the Missouri Public Commission ("Commission") for designation as an Eligible Telecommunications Carrier ("ETC") in exchanged served by AT&T Missouri and Sprint as described herein ("Designated Area") for the purpose of receiving low-income federal universal service support. Global Connection Incorporated of America will not request reimbursement from the federal high cost fund. As demonstrated below, Global Connection Incorporated of America satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Area. Furthermore, designation of Global Connection Incorporated of America in the Designated Area will serve the public interest. Accordingly, Global Connection Incorporated of America respectfully requests that the Commission grant this Petition.

I. GLOBAL CONNECTION INCORPORATED OF AMERICA

1. Global Connection Incorporated of America is a corporation organized under the laws of the State of Georgia, and was authorized to conduct business as a foreign corporation in the State of Missouri on May 14, 2004, document number 200414011204. Global Connection Incorporated of America has been certified by the Commission as a Competitive Local Exchange Carrier ("CLEC"), by Commission order effective May 14, 2004 in Case No.

P-T0408615653. Until now, the principal office of the Global Connection Incorporated of America is located at 3957 Pleasantdale Road, Atlanta, Georgia 30340. Global Connection Incorporated of America's web site URL is: <http://www.globalconnectioninc.com>.

2. Correspondence and communications regarding this Application should be directed to:

Houssam Abdallah
President and Owner
Global Connection Inc. of America
3957 Pleasantdale Road
Atlanta, GA 30340
sam@globalconnectioninc.com
1-(877)-511-3009 EXT 1101

3. Global Connection Incorporated of America was granted a Certificate to provide basic local telecommunication services on May 14, 2004 by this Commission. A copy of Global Connection Incorporated of America's

Certificate of Authority to do business in Missouri can be found in that docket.

4. Global Connection Incorporated of America is not yet providing local exchange or exchange access services in Missouri. However, Global Connection Incorporated of America expects to provide service in Missouri in AT&T Missouri and Sprint exchanges using a combination of unbundled network elements ("UNEs"), consisting of the local loop, ports and transport, provided by AT&T and Sprint and resale of the AT&T's and Sprint services.
5. Global Connection Incorporated of America is currently and in good standing with the Universal Service Administrative Global Connection Incorporated of America.

II. REQUESTED DESIGNATED AREA

6. Global Connection Incorporated of America requests that it be designated an ETC in the service area of AT&T Missouri and Sprint.

III. REQUIREMENTS FOR ELIGIBLE TELECOMMUNICATIONS SERVICE DESIGNATION

7. As set forth in Section 214(e)(2) of the Act, the state commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier

for a service area designated by the State commission.”³ Section 214(e)(2) of the Act further provides, in the case of areas not served by a rural telephone company, that the state commission shall designate more than one common carrier as a eligible telecommunications carrier, consistent with the public interest, convenience and necessity. Upon designation as an ETC, the carrier shall be eligible to receive universal service support in accordance with Section 254 of the Act.⁴

8. The requirements for designation as an ETC set forth in Section 214(e)(1) of the Act and 47 C.F.R. 54.501(d)(1) and (2) are that the carrier must be a “common carrier” and

- (A) offer the services that are supported by Federal universal support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and
- (B) advertise the availability of such services and the charges therefore using the media of general distribution.⁵

9. Additional requirements for ETC designation were adopted by the FCC in the March 17, 2005, which are codified at 47 C.F.R. 54.202(a)(1)-(5).⁶ Similar requirements were adopted by the Commission in 4 CSR 240-3.570. The additional requirements provide that a carrier requesting designation as an ETC must:

- (A) Commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service (47 C.F.R. 54.202(a)(1)(i), 4 CSR 240-3.570(3(C)(3));

- (B) Provide service on a timely basis to requesting customers within the applicant's service area where the applicant's network already passes the potential customer's premises (47 C.F.R. 54.202(a)(1)(i)(A), 4 CSR 240-3.570(3)(C)(3)(A));
- (C) Provide service within a reasonable period of time, if the potential customer is within the applicant's service area where the applicant's network already passes the potential customer's premises (47 C.F.R. 54.202(a)(1)(i)(A), 4 CSR 240-3.570(3)(C)(3)(A));
- (D) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed designated service area. Each applicant shall demonstrate how signal quality, coverage or capacity will improve due to the receipt of high-cost support; the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; the specific geographic areas where the improvements in a particular wire center are not needed, it must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area (47 C.F.R. 54.202(a)(1)(ii), 4 CSR 240-3.570(2)(A)(2));

- (E) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations (47 C.F.R. 54.202(a)(2)4 CSR 240-3.570(2)(A)(4));
- (F) Demonstrate that it will satisfy applicable consumer protection and service quality standards. A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case-by-case basis (47 C.F.R. 54.202(a)(3), 4 CSR 240-3.570(2)(A)(8); and
- (G) Demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation. (47 C.F.R. 54.202(a)(4), 4 CSR 240-3.570(2)(A)(10); and
- (H) Certify that the carrier acknowledges that the Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area (47 C.F.R. 54.202(a)(5), 4 CSR 240-3.570(2)(A)(9).

13. Pursuant to the FCC's Order released August 10, 2000, Section 214(e)(1) of the Act does not require a carrier to provide supported services throughout a service area prior to being designated an ETC.⁷

IV. GLOBAL CONNECTION INCORPORATED OF AMERICA SATISFIES THE REQUIREMENTS SET FORTH IN SECTION 214(E)(1) OF THE ACT AND 47 C.F.R 54.501(D)(1) AND (2) FOR DESIGNATION AS AN ETC TO SERVE THE DESIGNATED AREA.

14. Global Connection Incorporated of America is a common carrier as that term is defined in the Act.⁸ Global Connection Incorporated of America provides competitive local telecommunications services in several states as indicated in paragraph 6 above.
15. Global Connection Incorporated of America will offer all of the supported services enumerated under Section 254(c) of the Act using a combination of its "own facilities" and resale of another carrier's services. The term "facilities" under 47 C.F.R. Section 54.201 is defined as "any physical components of the telecommunications network that are used in the transmission of routing of the services that are designated for support pursuant to subpart B of this part."⁹ 47 C.F.R. Sec. 54.201(f) provides that "the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements..."¹⁰ Global Connection

Incorporated of America's use of AT&T Missouri and Sprint UNEs meets this definition of "facilities." Accordingly, Global Connection Incorporated of America satisfies the requirement set forth in Section 214(e)(1)(A) of the Act.

16. The services that are supported by Federal universal support mechanisms under Section 254(c) of the Act are enumerated in the FCC's and Commission's rules. ¹¹

These services are:

Voice grade access to the public switched telephone network.

Voice grade access to the public switched telephone network ("PSTN") is defined as "a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz." 47 C.F.R. § 54.101(a)(1). Global Connection Incorporated of America Incorporated of America meets this requirement by providing a voice grade access to the public switched network through its Siemens EWSD switch. Through its interconnection arrangements with Sprint and AT&T and other local exchange carriers, Global Connection Incorporated of America customers are able to make and receive calls on the public switched network within the specified bandwidth. Therefore, Global Connection Incorporated of America offers voice grade access to the public switched network within the meaning of 47 C.F.R. § 54.101(a)(1).

Local usage.

Local usage is defined as "an amount of minutes of use of exchange service, prescribed by the Commission, provided free of charge to end users." 47 C.F.R § 54.101 (a)(2). Global Connection Incorporated of America provides unlimited flat rate calling (i.e., non-metered or measured) access to its customers to local and EAS calling plans established and tarified by the incumbent carrier. Moreover, as a designated ETC, Global Connection Incorporated of America will comply with any and all minimum local usage requirements required by applicable law.

Dual tone multi-frequency ("DTMF") signaling or its functional equivalent.

Section (a)(3) of 47 C.F.R 54.101 provides for supported services to include "dual tone multi-frequency signaling or its functional equivalent." Dual tone multi-frequency ("DTMF") is defined as "a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time." Id. Global Connection Incorporated of America's network is fully DTMF-compliant.

Single-party service or its functional equivalent.

Single-party service is defined as "telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case if wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission." 47 C.F.R. § 54.101(a)(4). Global Connection Incorporated of America provides customers with single-party access for the duration of every phone call. Accordingly, Global Connection Incorporated of America provides customers with

single-party service within the meaning of the Federal Communication Commission's ("FCC's") regulations.

Access to 911 and E911 emergency service.

"Access to emergency services includes access to services, such as 911 and enhanced 011, provided by local governments or other public safety organizations." 47 C.F.R. § 54.101(5). Global Connection Incorporated of America provides access to 911 and enhances E911 and is fully interconnected with the Barren County public safety answering point ("PSAP") that serves the areas for which the Global Connection Incorporated of America seeks ETC designation.

Access to operator services.

Access to operator services is defined as "access to any automatic or live assistance to a customer to arrange for billing or completion, or both, of a telephone call." 47 C.F.R. § 54.101(6). Global Connection Incorporated of America provides access to operator services to its customers under contractual arrangements with an operator services provider.

Access to interexchange service ("IXC").

Access to interexchange service is defined as "the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network." 47 C.F.R. § 54.101(7). In addition to its own affiliate long distance Global Connection Incorporated of America, Global Connection Incorporated of America allows consumers to presubscribe to other interexchange carriers and complete dial

around calls for those carriers who have provisioned the appropriate facilities and support such services.

Access to directory assistance.

Access to directory assistance is defined as "access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings." 47 C.F.R. § 54.101(8). Global Connection Incorporated of America customers can access directory assistance services by dialing 411 or through the service offering of their presubscribed carrier by dialing 1+NPA+555+-1212. Global Connection Incorporated of America provides through the incumbent telephone company, listing in the white pages telephone directory published for the general area.

Toll limitation for qualified low-income consumers.

Toll limitation for qualifying low-income consumers is defined as "toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services, toll limitation, denotes both toll blocking and toll control." 47 C.F.R. § 54.400(d). Toll blocking "is a service provided by carriers that lets consumers elect not to allow the completion of outgoing toll calls from their telecommunications channel." 47 C.F.R. § 54.400(b). "Toll control is a service provided by carriers that allows consumers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle." 47 C.F.R. § 54.400(c). Global Connection Incorporated of America already makes toll limitation services available to its customers who request such services. Upon designation as an ETC, Global Connection Incorporated of America will offer these services to consumers who meet the qualifications for Lifeline as specified in 47 C.F.R. § 54.409.

17. Global Connection Incorporated of America will advertise the availability of the supported services detailed above, as well as the charges therefore, using media of general distribution in accordance with 47 C.F.R. § 54.201(d)(2). The methods of advertising utilized may include newspapers, magazines, radio, or television as well as other methods that constitute media of general distribution in the Designated Area of Missouri.
18. Global Connection Incorporated of America has undertaken considerable financial risk to overbuild the exchange in which it now seeks ETC designation. Absent access to funds, it is unlikely that the Global Connection Incorporated of America will be able to continue its aggressive plan of providing high quality services to the community it serves. Its five-year plan upon receipt of ETC designation is to improve its coverage in the few areas it now lacks facilities; improve redundancy within its network; offer Lifeline Services to eligible subscribers; expand local calling options; and upgrade its network to new technologies arrive.
19. Global Connection Incorporated of America will comply with all applicable federal and state consumer protection, consumer privacy and service quality standards.

VII. PUBLIC INTEREST ANALYSIS

20. In the March 17, 2005 Order, the FCC adopted, and encouraged the states to utilize, a cost-benefit analysis methodology of determining whether an application for ETC designation is in the public interest.¹² The Commission also requires that an ETC applicant demonstrate that the grant of ETC designation would be consistent with the public interest, convenience and necessity. ¹³
21. According to the FCC, the public interest analysis should take into account the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable and affordable rates, and the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas. ¹⁴
22. Because the FCC's rules indicate that a state commission shall designate more than one ETC in an area served by a non-rural incumbent, the FCC indicated that the public interest analysis may be conducted differently, certain factors may be given more weight than others, and that state commissions may reach a different outcome in applying the test to carriers serving in a non-rural area. The FCC also indicated that the public interest inquiry need not be as rigorous for carriers seeking ETC designation in non-rural carrier areas.

23. The FCC's cost-benefit analysis consists of the weighing and consideration of such factors as 1) the benefits of increased consumer choice; and 2) the advantages and disadvantages of an applicant's service offering. Among the advantages may be that an ETC designation will permit consumers to be subject to fewer toll charges, and to obtain access to premium services, such as voice mail, call forwarding, three-way calling and call waiting. Disadvantages might include dropped call rates and poor coverage.

VIII. GLOBAL CONNECTION INCORPORATED OF AMERICA'S DESIGNATION AS AN ETC IN MISSOURI IS IN THE PUBLIC INTEREST, CONVENIENCE AND NECESSITY

24. Global Connection Incorporated of America applies the FCC's public interest test, demonstrating that Global Connection Incorporated of America's designation, as an ETC in the state of Missouri is consistent with the public interest, convenience and necessity as follows:

A. Global Connection Incorporated of America's Designation Would Lead to Increased Consumer Choice

25. Competitive carriers do not often request ETC designation or offer Lifeline and Link-Up service. Designation of Global Connection Incorporated of America as an ETC will increase the low-income consumer's choice of carriers.
26. For those consumers who have been disconnected from ILEC or other competitive carriers for non-payment of bills, Global

Connection Incorporated of America will provide an alternative to higher priced pre-paid local exchange carriers.

B. Global Connection Incorporated of America's
Designation Would Lead to Increased Subscribership

27. According to the FCC, in 2004 ¹⁵ only one-third of households eligible for Lifeline and Link-Up service subscribed to these programs, at a time when poverty rates were increasing. ¹⁶ Global Connection Incorporated of America's aggressive advertisement of Lifeline and Link-Up services, at a cost of approximately \$10,000.00 per state per month, ensures that a significant portion of the eligible population is aware of the availability of low-income telephone service programs. Increased awareness leads to increased subscribership in these programs for all carriers.
28. Global Connection Incorporated of America's customers generally have poor credit and have had service disconnected by ILEC or another competitive local exchange carrier because of unpaid bills. These consumers may be without telephone service altogether because of an inability to bring their accounts current and comply with other requirements for being reconnected, such as the payment of a deposit and/or reconnection fee. Global Connection Incorporated of America removes significant barriers to telephone subscribership by providing service to all Lifeline and Link-Up eligible consumers within its designated service area without credit

checks or the imposition of a deposit, and despite the customer having been disconnected by another carrier.

C. Global Connection Incorporated of America's Designation Would Result in a Significant Reduction in Toll Charges, thereby making Telephone Service More Affordable

29. Global Connection Incorporated of America provides toll restriction services throughout its designated service area, free of charge, as required by the FCC's rules. In addition, Global Connection Incorporated of America's customer services personnel are trained to and do actively educate the Global Connection Incorporated of America's potential customers on the benefits of toll limitation service in reducing the customer's telephone bill. Global Connection Incorporated of America's customer service staff also recommends the use of prepaid long distance calling cards as an alternative to subscription to Interexchange telephone service. As a result, the majority of Global Connection Incorporated of America's customers choose toll restriction service and/or prepaid long distance telephone cards, which leads to affordable telephone service for the low-income consumer.

D. Global Connection Incorporated of America's Designation Would Make Premium Services Available to Low Income Customers

30. Global Connection Incorporated of America's service offering includes premium services, such as Caller ID, Call Waiting and Three-way Calling.

E. Global Connection Incorporated of America's
Procedures and Processes are Geared Toward the Low-
Income Customer

31. Global Connection Incorporated of America bills its low-income customers at the beginning of the month, when the customer is likely to have funds available for payment of bills. In addition, Global Connection Incorporated of America keeps telephone service simple, offering flat rated, unlimited local exchange service and a few custom-calling features. Global Connection Incorporated of America does not up sell its low-income customers features and services that the customer cannot afford. As a result, the customer pays one, consistent monthly rate.

32. Global Connection Incorporated of America requests reimbursement from the Low-Income Division of the USAC only. Global Connection Incorporated of America does not request reimbursement from any state universal service fund, or from the High Cost Division of the USAC.

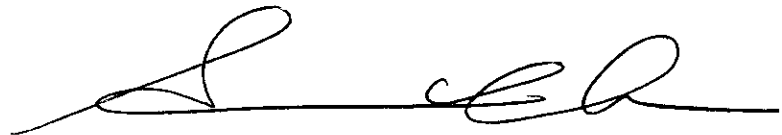
33. Global Connection Incorporated of America primarily will serve consumers that were previously customers of other carriers, such as AT&T Missouri and Sprint. Thus, the

Global Connection Incorporated of America's reimbursement from the USAC is transferred from the previous carrier to Global Connection Incorporated of America. The only increase in demand on the Federal Universal Service Fund would be for those consumers who subscribe to telephone service for the first time.

Conclusion

For all of the reasons set forth herein, Global Connection Incorporated of America respectfully requests the Missouri Public Service Commission to designate it an Eligible Telecommunications Carrier in the area served by AT&T Missouri and Sprint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Houssam Abdallah', written over a horizontal line.

Houssam Abdallah
President and Owner
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