

4. The Commission need not hold a hearing, if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989).

WHEREFORE, Staff respectfully recommends the Commission cancel the certificates of service authority to provide basic local telecommunications and non-switched local and intrastate interexchange telecommunications services in Missouri of Global Connection Inc. of America; and grant such other and further relief as the Commission finds just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne
Legal Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 14th day of March, 2019, to all counsel of record.

/s/Whitney Payne

RECEIVED²

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 5 2019

Records
Public Service Commission

In the Matter of)
) WC Docket No. _____
Section 63.71 Application of)
Global Connection Inc. of America)

SECTION 63.71 APPLICATION

Global Connection Inc. of America (Global or the Company)¹ hereby seeks authorization, pursuant to Section 214(a) of the Communications Act of 1934, as amended (the Act), 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. § 63.71, to discontinue its provision of resold domestic wireline services in the states of Florida, Illinois, Indiana, Kansas, Missouri, Ohio and Oklahoma (Phase I States).²

Global currently operates as a reseller of local exchange and interexchange wireline telecommunications services in twenty-six (26) states.³ The Company holds blanket domestic and international Section 214 authority from the Commission.⁴ Global also operates as a wireless carrier in over two dozen jurisdictions. The Company does not propose to discontinue any of its wireless services in any states at this time.

¹ Global’s FCC Registration Number (FRN) is 0010765329.

² Global continues to review its strategic business plans for operations in other states.

³ In connection with the proposed discontinuance, Global is surrendering or otherwise arranging for cancellation of its intrastate wireline authorizations in the Phase I States. The Company is designated in twelve states, including Florida, as a wireline Eligible Telecommunications Carrier for Lifeline services only. The Company is not designated as a wireline ETC in any of the other Phase I States.

⁴ Global holds domestic Section 214 authority pursuant to operation of law. 47 C.F.R. § 63.01. The Company was granted international Section 214 authority on May 7, 2004 in File No. ITC-214-20040421-00150. Global does not provide (and is not discontinuing) international service to any of the customers involved in this discontinuance.

Global provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. Name and Address of Carrier: Global is located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093.

2. Date of Planned Service Discontinuance, Reduction or Impairment: The Company plans to discontinue the provision of these local exchange and long distance services beginning on April 16, 2019, subject to receipt of regulatory approvals.⁵ Global understands that this application will be automatically granted on the 31st day after public notice of filing unless the Commission notifies the Company to the contrary.

3. Points of Geographic Areas of Service Affected: Global proposes to discontinue the provision of these services in the following states: Florida, Illinois, Indiana, Kansas, Missouri, Ohio and Oklahoma.

4. Brief Description of Type of Service Affected: The Global service offerings affected by this discontinuance are comprised of prepaid wireline local exchange and long distance services. These services provide voice service over the public switched telephone network (PSTN).

After extensive assessment, Global has determined that its strategic business plans for these states do not include continued provision of wireline services. The Company will focus upon provision of competitive wireless services in these areas. Global has very few wireline customers in these states to be adversely affected by the discontinuance. Moreover, consumers in these states will not be harmed generally by the discontinuance of these services because they

⁵ The discontinuances are scheduled to occur over a period from April 16, 2019 through May 30, 2019. The Company intends to time the discontinuances based upon each customer's prepaid service period. Each customer has been sent a notice identifying the specific date on which his or her service discontinuance is scheduled.

will have access to a considerable number of alternative providers, including the incumbent local exchange carrier and competitive carriers offering wireline, wireless and Voice over Internet Protocol services.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers: Global has a total of seventy-five (75) or fewer customers for wireline services in the states where it proposes to discontinue wireline operations. These customers have been provided at least forty-five (45) days' advance notice, via first-class mail, of the discontinuance of service.⁶ A copy of the notice content, which complies with the requirements of 47 C.F.R. § 64.1120(e) is attached.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to Be Discontinued, Reduced or Impaired: Global is considered non-dominant with respect to the affected services.

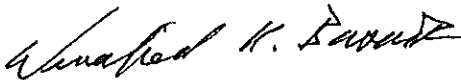
In accordance with Section 63.71 of the Commission's Rules and concurrent with the filing of this Application, a copy of this Application is being mailed to the Special Assistant for Telecommunications for the Secretary of Defense, the Governor of each of the states where services are being discontinued and to the public utility commission for each such state.

Additional questions regarding this application should be addressed to the undersigned.

⁶ Customer notices were sent between February 25, 2019 and February 27, 2019.

Respectfully submitted,

Global Connection Inc. of America

By: 

Winafred Brantl
Kelley Drye & Warren LLP
3050 K Street, NW – Suite 400
Washington, DC 20007
Tel: (202) 945-6649
E-Mail: wbrantl@kelleydrye.com

Dated: March 1, 2019

Its Attorneys

Sample Customer Notice of Discontinuance



5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



February 25, 2019

[Customer Name]
[Customer Address]
[City, State Zip]

Notice of Discontinuance of Your Telephone Service by Global Connection Inc. of America

Dear Global Connection Customer:

We regret to inform you that we are preparing to discontinue the provision of wireline local and long distance telephone services in [State]. As a result, subject to receipt of required regulatory approvals, your Global Connection Real Home Phone service will be discontinued on or shortly after [DATE].

In order to avoid a disruption in telephone service, you must make arrangements to receive service from a new telephone company before [DATE]. Please note, you will have one or more service renewal dates, the last being on [DATE]. If you continue to renew your service by those renewal dates, you will continue to have telephone service until your Last Service Date of [DATE].

As always, you may choose not to renew your service on or by your upcoming renewal date(s) and instead terminate your service at that time.

If your account is set up for Automatic Renewal, the service will be renewed on [DATE], unless you contact the Call Center at the number below.

If you do not arrange to have your telephone service provided by a new telephone company prior to your Last Service Date, you will lose telephone service (which means that you will be unable to make local calls including 911) and you may not be able to keep your current telephone number(s) with the new service provider. We urge you not to delay in arranging for a new service provider, as some carriers may require several weeks to install new services. To help avoid any lapse in your service, please check carefully that all services you currently receive from Global Connection, including both local and long distance services, are moved to your new carrier.

The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. We also enclose a list of providers that may be operating in your area. If you arrange for new service before your Global Connection service is



5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



terminated and wish to keep your current telephone number(s), please be sure to address this with your new service provider.

Global Connections offers prepaid wireless service under the brand StandUp Wireless. You have the option of selecting an Unlimited Talk, Unlimited Text and 1 Gigabyte of Mobile data for Twenty dollars per month. The plan includes long distance calling, voicemail and standard features for a significant discount to your current landline service. If you would like to purchase this option as an alternative to your landline service, or have questions please call us at 800-551-7993

The Federal Communications Commission requires us to provide you with the following notice in connection with its review of the proposed discontinuance:

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Global Connection Inc. of America. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of our services in [State], please contact Global Connection Customer Service at 800-551-7993.

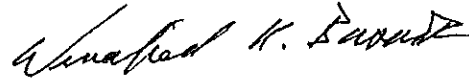
Sincerely,
Global Connection Inc. of America

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 1st day of March, 2019 by mailing true and correct copies thereof, postage prepaid, to the following persons at the addresses listed below.

Adam J. Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399	Office of Governor Ron DeSantis PL 05 The Capitol 400 South Monroe Street Tallahassee, FL 32399-0001
Ms. Elizabeth Rolando Chief Clerk Illinois Commerce Commission 527 E. Capitol Avenue, 8th Floor Springfield, Illinois 62701	Office of Governor J.B. Pritzker State Capitol 207 Statehouse Springfield, IL 62706
Indiana Utility Regulatory Commission Communications Division PNC Center, Suite 1500 East 101 West Washington Street Indianapolis, Indiana 46204	Office of Governor Eric Holcomb 200 W. Washington St., Rm. 206, Indianapolis, IN 46204
Lynn M. Retz Secretary Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604-4027	Office of Governor Laura Kelly Capitol 300 SW 10th Avenue, Suite 2125 Topeka, KS 66612-1590
Morris Woodruff Secretary Missouri Public Service Commission 200 Madison Street Jefferson City, Missouri 65102-0306	Missouri Office of Governor Mike Parson Capitol Building P.O. Box 720 Jefferson City, MO 65102
Tanowa N. Troupe Secretary Public Utilities Commission of Ohio 180 E. Broad St. Columbus, OH 43215	Office of Governor Mike DeWine Riffe Center, 30th Floor 77 South High Street Columbus, OH 43215
Ms. Peggy Mitchell Secretary Oklahoma Corporation Commission 2101 North Lincoln Boulevard Oklahoma City, Oklahoma 73105	Office of Governor Kevin Stitt Capitol Building 2300 Lincoln Blvd., Room 212 Oklahoma City, OK 73105

Secretary of Defense Attn: Special Assistant for Telecommunications Pentagon Washington, D.C. 20301	
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Winafred Brantl

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MAR 05 2019

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Public Service Commission

Keri Salsman

KELLEY
DRYE

KELLEY DRYE & WARREN LLP
WASHINGTON HARBOUR, SUITE 400
3050 K STREET, NW
WASHINGTON, DC 20007

Morris Woodruff
Secretary
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102-0306

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, DC 20007

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STAMFORD, CT
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MAR 13 2019

*Records
Public Service Commission*

March 12, 2019

Morris Woodruff
Secretary
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102

Re: Global Connection Inc. of America Notice of Service Discontinuance
and Request for Cancellation of Telecommunications Authorizations

Dear Mr. Woodruff:

Global Connection Inc. of America (Global or the Company) submits this filing to notify the Missouri Public Service Commission (Commission) of its intention to discontinue provision of wireline telecommunications services in Missouri and to request that the Company's intrastate Missouri wireline telecommunications authority and associated tariff be cancelled on or after May 5, 2019.

Discontinuance of Service

At this time, Global has only ten customers in Missouri for its wireline services. The Company has provided these customers with at least forty-five (45) days' notice of service discontinuance to be effective beginning on April 26, 2019.¹

Cancellation of Telecommunications Authority and Tariff

The Commission granted Global authority to provide competitive intrastate wireline telecommunications services in Missouri on November 22, 2004 in Case No. XA-2005-0090

¹ The discontinuances are scheduled to occur on dates beginning with April 26, 2019 and concluding on May 4, 2019. The Company intends to time the discontinuances based upon each customer's prepaid monthly service period. Each customer has been sent a notice identifying the specific date on which his or her discontinuance is scheduled. A sample of this notice is appended.

Page Two

(interexchange) and on January 17, 2005 in Case No. CA-2005-0097 (local exchange).² After extensive assessment of the market, Global has determined that its strategic business plans in Missouri do not include the continued provision of wireline telecommunications services.³ As noted, the Company has but ten customers for its services in the State. Accordingly, Global requests cancellation of its certificate and tariff on or after May 5, 2019 (following discontinuance of the Company's Missouri wireline customers). The Company's surrender of its authority will have no adverse consequences for consumers in Missouri as they have access to a range of alternative providers and services.

This filing applies solely to Global's wireline operations in Missouri. Global will continue to operate as a wireless carrier and wireless Eligible Telecommunications Carrier (ETC) in the State.

Please contact me at (202) 945-6649 or via email at wbrantl@kelleydrye.com if you have any questions concerning this matter. Thank you for your assistance with this request.

Respectfully submitted



Winifred R. Brantl
Kelley Drye & Warren, LLP
3050 K St., NW Suite 400
Washington, DC 20007

Counsel for Global Connection Inc. of America

² Global also operates in Missouri as a provider of commercial mobile radio services (CMRS) under the d/b/a Stand Up Wireless and was designated by the Commission as a Lifeline-only Eligible Telecommunications Carrier in connection with its wireless services on November 5, 2011 in Case No. RA-2011-0299.

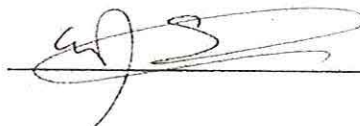
³ Global is also discontinuing provision of interstate wireline services to Missouri customers and has made the appropriate filing with the Federal Communications Commission. Pursuant to 47 C.F.R. § 63.71(a), the Commission has been served with a copy of the Company's application for discontinuance of interstate wireline service.

VERIFICATION

STATE OF GEORGIA §
 §
COUNTY OF GWINNET §

I, Eric Schimpf, state that I am the Chief Operating Officer of Global Connection Inc. of America (Global Connection); that I am authorized to make this Verification on behalf of Global Connection; that I have read the foregoing document; and that the statements in the foregoing document, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.



Subscribed and sworn to before me this 11th day of March, 2019.

Notary Public 

My Commission expires: April 3, 2020





5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



February 25, 2019

[Customer Name]
[Customer Address]
[City, State Zip]

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The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. We also enclose a list of providers that may be operating in your area. If you arrange for new service before your Global Connection service is



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We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of our services in [State], please contact Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America