

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

\_\_\_\_\_)  
In the matter of the Application of )  
Vodafone Global Enterprise, Inc. )  
For a Certificate of Service Authority to )  
Provide Interexchange Telecommunications )  
Service in the State of Missouri )  
\_\_\_\_\_)

Case No. \_\_\_\_\_

**APPLICATION FOR A CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE  
INTEREXCHANGE TELECOMMUNICATIONS SERVICES IN MISSOURI**

Comes now Vodafone Global Enterprise, Inc. (“VGEI,” “Company” or “Applicant”), pursuant to Sections 392.361, 392.410, 392.420, 392.430, 392.440, 392.461, and 392.470, RSMo, and 4 CSR 240-2.060 and 240-3.510, and in support of its Application for certificate of service authority as an interexchange service carrier to provide telecommunication services in the State of Missouri and to classify said services as competitive, states to the Missouri Public Service Commission (“Commission”) as follows:

1. VGEI is a corporation duly organized and existing under and by virtue of the laws of Delaware authorized to conduct business in Missouri. Its headquarters and principal place of business are located at 560 Lexington Avenue, 9<sup>th</sup> Floor, New York, New York 10022. A copy of its Certificate of Good Standing to do business in Missouri is attached as **Appendix A.** VGEI is a wholly-owned subsidiary of Vodafone Group, PLC, a British multinational telecommunications company based in London. Vodafone is among the world’s largest telecommunications companies, serving over 400 million customers as of March 2013.

Vodafone delivers mobile voice and data services directly via its own networks or through partner networks in more than thirty countries around the globe. Partner networks provide access to over forty more countries. Vodafone's Global Enterprise division was established in 2007 to focus on the provision of telecommunications and information technology services throughout this vast service territory.

2. All inquiries, correspondence, communications, pleadings, notices, orders, and decisions relating to the case should be addressed to:

Carl J. Lumley  
Curtis, Heinz, Garret & O'Keefe P.C.  
130 S Bemiston, Suite 200  
St. Louis, MO 63105-1913  
Email: [clumley@lawfirmemail.com](mailto:clumley@lawfirmemail.com)  
Phone: (314) 725-8788

With a copy to:

Megan Doberneck  
General Counsel  
Vodafone Americas Inc.  
999 18th Street, Suite 1750  
Denver, CO 80202; USA  
Email: [megan.doberneck@vodafone.com](mailto:megan.doberneck@vodafone.com)

Following grant of this application, copies of all correspondence, notice, inquiries and orders relating to consumer issues regulatory filings, tariffs and all other issues should be sent to the following VGEI personnel:

Megan Doberneck  
General Counsel  
Vodafone Americas Inc.  
999 18th Street, Suite 1750  
Denver, CO 80202; USA  
Email: [megan.doberneck@vodafone.com](mailto:megan.doberneck@vodafone.com)

3. VGEI seeks Commission certification to provide telecommunications service in Missouri. Specifically, VGEI seeks authority as an interexchange telecommunications service carrier to offer and provide telecommunications services, pursuant to Sections 392.410, 392.430, and 392.440, RSMo.

4. By this Application, Applicant proposes to provide intraLATA/interLATA interexchange telecommunications service to business customers within the State of Missouri, including but not limited to basic “1+” long distance services, calling card services and toll-free services. VGEI will also provide customers with access to directory assistance and operator-assisted calling.

5. VGEI intends to provide its services to enterprise level business customers and other carriers. VGEI will provide service by reselling the underlying services of facilities-based interexchange carriers authorized by the Commission to operate in Missouri.

6. Applicant requests exemption from tariff filing requirements pursuant to Section 392.461 RSMo. Instead, VGEI wishes to make available the rates, terms, and conditions for its retail telecommunications service on its website, found at <http://enterprise.vodafone.com/home/>.

7. VGEI will appropriately identify and bill intrastate and interstate traffic based upon the accompanying call detail, consistent with state and federal law. VGEI’s underlying carriers’ networks have the capability to generate and process this information. The Company will provide appropriate compensation for associated access services consistent with federal and state law.

8. The Commission may grant VGEI a certificate of service authority as an interexchange telecommunications service carrier to provide telecommunication services if the

Commission finds such authority to be in the public interest. Approval of this Application will serve the public interest because VGEI's proposed services are consistent with the public interest and with the legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter 392 RSMo. Approval of this Application will expand the availability of innovative, high quality, and reliable telecommunications services within the State of Missouri.

9. VGEI seeks classification of itself and its services as competitive. Applicant submits that the services it provides are subject to sufficient competition to justify competitive classification and promote the public interest. See Section 392.361. Granting this Application will further competition and allow VGEI to compete with other companies, consistent with the Commission's policies and the legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter 392 RSMo. Applicant submits that the public interest will be served by Commission approval of this application because Applicant's proposed services will create and enhance competition and expand customer service options. Approval will also expand the availability of innovative, high quality, and reliable telecommunications services within the state of Missouri. Accordingly, all the services which VGEI proposes to provide should be designated as competitive, and VGEI should be designated as a competitive telecommunications company.

10. VGEI will not unjustly discriminate among its customers as is prohibited by Section 392.200 RSMo. Applicant is willing to comply with all applicable Commission rules, except those which are specifically waived by the Commission. Consistent with the Commission's treatment of other certificated interexchange telecommunications carriers, VGEI requests that the following statutes and regulations be waived for VGEI with respect to its interexchange service offerings, pursuant to Sections 392.361.5, 392.420 and 392.461, RSMO:

Statutes:

- 392.210.2 Accounting requirements (system of accounts)
- 392.240.1 Reasonableness of rates
- 392.270 Accounting requirements (valuation of property)
- 392.280 Accounting requirements (depreciation rates/accounts)
- 392.290 Issuance of stocks, bonds and other indebtedness
- 392.300 Transfer of property and ownership of stock
- 392.310 Approval of issuing stocks, bonds and other indebtedness
- 392.320 Certificate of Commission to be recorded-stock dividends
- 392.330 Accounting requirements (proceeds of sales of stock, bonds, notes, etc.)
- 392.340 Company reorganization

Rules:

- 4 CSR 240-3.520 Applications to sell or transfer assets
- 4 CSR 240-3.525 Applications to merge or consolidate
- 4 CSR 240-3.530 Applications to issue stocks, obtain loans
- 4 CSR 240-3.535 Applications to acquire stock
- 4 CSR 240-3.545(8)(C) Listing of Waivers in Tariff
- 4 CSR 240-3.550 Telco Records and Reports (except (5)(B), (D) and (E))
- 4 CSR 240-3.555 Residential Customer Inquiries
- 4 CSR 240-3.560 Procedure for Ceasing Operations
- 4 CSR 240-10.020 Depreciation Records
- 4 CSR 240-30.020 Residential Telephone Underground Systems
- 4 CSR 240-30.040 Uniform System of Accounts
- 4 CSR 240-32.010 General Provisions
- 4 CSR 240-32.040 Metering, Inspections and Tests
- 4 CSR 240-32.050 Customer Services
- 4 CSR 240-32.060 Engineering and Maintenance
- 4 CSR 240-32.070 Quality of Service
- 4 CSR 240-32.080 Service objectives and surveillance levels
- 4 CSR 240-32.090 Connection of equipment and Inside Wiring
- 4 CSR 240-32.100 Provision of Basic Local and Interexchange Services
- 4 CSR 240-32.130-170 Prepaid Calling Cards (except 32.140 and 32.150(1))
- 4 CSR 240-32.180-190 Caller ID blocking requirements
- 4 CSR 240-33.010 Service and Billing Practice General Provisions
- 4 CSR 240-33.040 Billing and Payment standards
- 4 CSR 240-33.045 Clear identification and placement of charges on bills
- 4 CSR 240-33.050 Deposits
- 4 CSR 240-33.060 Residential Customer Inquiries
- 4 CSR 240-33.070 Discontinuance of service
- 4 CSR 240-33.080 Disputes by Residential Customers
- 4 CSR 240-33.090 Settlement agreements with residential customers
- 4 CSR 240-33.130 Operator service requirements
- 4 CSR 240-33.140 Payphone requirements (except (2))

4 CSR 240-33.150 "Anti-slamming" requirements  
4 CSR 240-33.160 Customer Proprietary Network Information

11. VGEI does not have any pending action or final unsatisfied judgment or decisions against it from any state or federal agency or court which involves customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of application.

12. VGEI does not have any overdue annual reports or assessment fees due to the Missouri Public Service Commission.

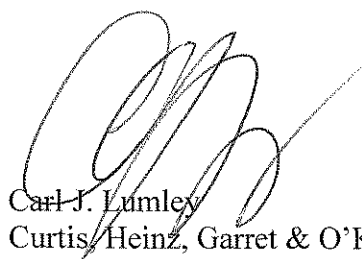
13. VGEI also possesses the necessary financial resources to provide the services proposed in this Application. The Company is a wholly-owned subsidiary of Vodafone Global PLC, as described above in Paragraph 1. In 2013, Vodafone Group PLC reported \$70.2 billion in revenues from its global operations. Thus, as a wholly-owned subsidiary of Vodafone Group PLC, VGEI has reliable access to ample working capital to fund VGEI's proposed operations in Missouri, including the ability to meet any obligations associated with its provision of competitive telecommunications services in Missouri.

14. Applicant states that it will undertake all necessary measures to ensure its contracts with other companies and carriers do not contain provisions preventing delivery of traffic to any telephone exchange area, and that such measures include but are not limited to:

- Prevention of call blocking and/or call gapping based on the cost of traffic termination.
- Preventing the alteration or stripping of Calling Party Number Identification.
- Ensuring sufficient network capacity exists to process all traffic according to industry accepted practices.

**WHEREFORE**, applicant VGEI respectfully requests that the Commission grant it a certificate of service authority as an intrastate interexchange telecommunications service carrier to provide telecommunication services as herein requested, grant competitive status to Applicant and Applicant's requested services, grant a waiver of the aforesaid statutes and regulations set forth in this Application, and grant such other relief as the Commission deems appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'CL', is written over the printed name and address.

Carl J. Lumley  
Curtis/Heinz, Garret & O'Keefe P.C.  
130 S Bemiston, Suite 200  
St. Louis, MO 63105-1913  
Phone: (314) 884-7503  
Fax: (314) 884-7533  
Email: [clumley@lawfirmemail.com](mailto:clumley@lawfirmemail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was  
went by electronic submission, hand delivered or sent by U.S. Mail, postage prepaid, this <sup>7th</sup> ~~XX~~

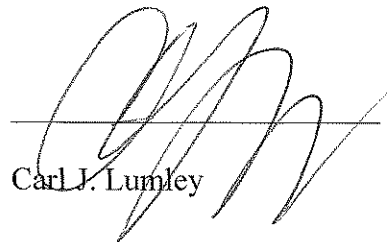
Day of October, 2013 to:

Office of the Public Counsel  
PO BOX 7800  
Jefferson City, Missouri 65102

[pccservice@ded.mo.gov](mailto:pccservice@ded.mo.gov)

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)



Carl J. Lumley



## VERIFICATION

STATE OF Colorado )  
 ) ss.  
County of Denver )

I, Megan Doberneck, being first duly sworn upon oath, depose and say that I am the General Counsel and Company Secretary of Vodafone Global Enterprise Inc., and as such am authorized to make this verification on its behalf; that I have read the foregoing Application; that I know the contents thereof; and that the facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

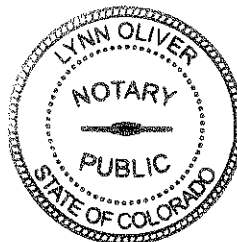
Joe Dale

Subscribed and sworn to before me this 3rd day of October, 2013.

Lynn Oliver

Notary Public

My Commission expires: 4/21/14



Commission Expires April 21, 2014

# STATE OF MISSOURI



Jason Kander  
Secretary of State

**CORPORATION DIVISION  
CERTIFICATE OF GOOD STANDING**

I, JASON KANDER, Secretary of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

**VODAFONE GLOBAL ENTERPRISE INC.**

using in Missouri the name

**VODAFONE GLOBAL ENTERPRISE INC.  
F01129371**

a DELAWARE entity was created under the laws of this State on the 24th day of March, 2011, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 7th day of October, 2013

A handwritten signature in cursive script, reading "Jason Kander", is written over a horizontal line.

Secretary of State

