

**Lance J.M. Steinhart, P.C.**

Attorney At Law  
1720 Windward Concourse  
Suite 250  
Alpharetta, Georgia 30005

Also Admitted in New York  
and Maryland

Telephone: (770) 232-9200

Facsimile: (770) 232-9208

Email: lsteinhart@telecomcounsel.com

March 3, 2004

**VIA OVERNIGHT DELIVERY**

Mr. Dale Roberts  
Chief A.L.J./Executive Secretary  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Jefferson City, MO 65102  
(573) 751-3234

**FILED<sup>4</sup>**

**MAR 04 2004**

**Missouri Public  
Service Commission**

Re: Total-Tel USA Communications, Inc.  
Case No. TC-2004-0363

Dear Mr. Roberts:

Enclosed please find for filing an original and eight (8) copies of Total-Tel USA Communications, Inc.'s Response to Complaint.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

  
Lance J.M. Steinhart  
Attorney for Total-Tel USA Communications, Inc.

**Enclosures**

cc: Frank Pazera  
Office of Public Counsel  
Office of General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>4</sup>

MAR 04 2004

The Staff of the Missouri Public  
Service Commission,

Complainant

v.

Total-Tel USA Communications, Inc.

Respondent.

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Missouri Public  
Service Commission

Case No. TC-2004-0363

RESPONSE TO COMPLAINT

Total-Tel USA Communications, Inc. (hereinafter "Respondent"), by its attorneys, hereby respectfully requests that the Missouri Public Service Commission (the "Commission") dismisses the Complaint dated February 6th, 2004 in the above-referenced Case.

Total-Tel USA Communications, Inc. changed its name to Covista Communications, Inc. on or about 1999. Furthermore, in 1998, Respondent began the process of transferring its authorizations to provide long distance services to its wholly-owned subsidiary, Covista, Inc. f/k/a TotalTel, Inc. In some states, including Missouri, TotalTel, Inc. obtained through the initial application process its own authorization to provide long distance service. TotalTel, Inc. was issued a certificate of service authority by this Commission on September 30, 1998 in Case No. TA-99-63. TotalTel, Inc.'s name change to Covista, Inc. was approved by this Commission on December 20, 2000 in Case No. TO-2001-319. To the Respondent's knowledge, Covista, Inc. is currently in good standing with this Commission.

Due to an administrative oversight, Respondent's certificate of service authority to provide long distance service in the State of Missouri has never been cancelled. In addition to the Respondent respectfully requesting that the Complaint be dismissed, it further requests that its certificate of service authority be cancelled. All of the company's long distance operations have been performed by its subsidiary, Covista, Inc. f/k/a TotalTel, Inc. Respondent has no operations, but rather is a publicly traded fully reporting SEC holding company.

Total-Tel USA Communications, Inc. submitted a completed 2002 Annual Report form to the Commission's Data Center.

Respondent earnestly apologizes to the Commission, and would like to assure the Commission that future filings by the appropriate entity, Covista, Inc. will be timely and accurate. Respondent has taken steps, and will take any further necessary steps, to insure that it remains in compliance with Commission rules and regulations.

WHEREFORE, Total-Tel USA Communications, Inc. respectfully requests that its certificate of service authority in the state of Missouri be cancelled, and that the Complaint be dismissed for the reasons set forth herein.

**Respectfully submitted,**

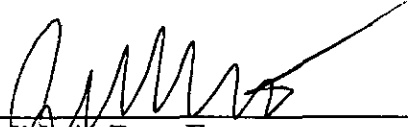
**Total-Tel USA Communications, Inc.**

By: \_\_\_\_\_

  
**Lance J.M. Steinhart**

**Lance J.M. Steinhart, PC  
1720 Windward Concourse  
Suite 250  
Alpharetta, Georgia 30005  
(770) 232-9200  
(770) 232-9208 (Fax)  
Georgia Bar No. 678222**

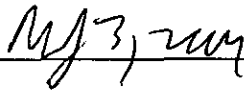
**and**

  
\_\_\_\_\_  
**Judith A. Rau, Esq.**

**Rau & Rau  
119 E. Mill Street  
Waterloo, IL 62298  
(618) 939-7186  
Missouri Bar No. 24856**

**Attorneys for Respondent**

**Dated:** \_\_\_\_\_




## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Response to Complaint on the following parties, in accordance with the Commission rules:

Office of the Public Counsel  
P. O. Box 7800  
Jefferson City, MO 65102

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

Dated this 3d day of Nov, 2004.

  
\_\_\_\_\_  
Lance J.M. Steinhart  
Georgia Bar No. 678222

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Suite 250  
Alpharetta, Georgia 30005  
(770) 232-9200