

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

In the Matter of the Application of                    )  
dPi Teleconnect, LLC for Designation as        )        File No. CO-2010-0054  
an Eligible Telecommunications Carrier        )

**STATUS REPORT AND MOTION FOR INSPECTION OF RECORDS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and files this *Status Report And Motion For Inspection Of Records (Status Report And Motion)*, hereby requesting an order pursuant to 386.450 RSMo (2000) for the Missouri Public Service Commission (Commission) to order dPi Teleconnect, LLC (dPi or Company) to allow the Staff to inspect the Company's books, accounts, papers and records. For this *Status Report And Motion*, Staff respectfully states the following:

1.       Effective November 29, 1999, in Case No. TA-2000-44, the Commission granted dPi a Certificate of Service Authority to provide basic local and exchange access telecommunication services in the State of Missouri.
  
2.       On August 7, 2009, dPi filed an *Application For Designation As An Eligible Telecommunications Carrier (Application)*, requesting designation throughout certain AT&T Missouri service territories for the purpose of receiving federal universal service low income support.
  
3.       On September 23, 2009, the Staff filed a motion for an extension until October 30, 2009, to file a status report. Staff has diligently investigated and reviewed dPi's *Application*. Beginning in August 2009, and throughout this case, Staff has requested the

Company to provide responses to numerous data requests. The Company has sent limited responses to some of the requests.

4. After review, the Staff found discrepancies between the information provided and the Company's annual reports, which lead Staff to further question the facilities owned and resale provided by the Company, and whether the Company has fully complied with the collection and funding requirements for the Missouri Universal Service and Relay Missouri Funds.

5. Section 386.450 RSMo (2000) provides "...on its own initiative the commission may require, by order served upon any corporation, person or public utility...the production within this state.... of any books, accounts, papers or records kept by said corporation, person or public utility....so that an examination thereof may be made by....the commission or under its direction."

**WHEREFORE**, the Staff respectfully files this *Status Report And Motion*, and requests that the Commission issue an order for dPi Teleconnect, LLC to produce any books, accounts, papers or records regarding its operations in the State of Missouri at the Staff Counsel's Offices at Room 810, 200 Madison Street, Jefferson City, Missouri 65102, on a date and time determined by the Administrative Law Judge assigned to this case, for the purpose of the examination of said books, accounts, papers or records, in accordance with Section 386.450 RSMo (2000).

Respectfully submitted,

**/s/ Jennifer Hernandez**

Jennifer Hernandez

Legal Counsel

Missouri Bar No. 59814

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Missouri Public Service Commission

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Mark P. Johnson, Sonnenschein Nath & Rosenthal LLP, Attorneys for dPi Teleconnect, LLC at [mjohnson@sonnenschein.com](mailto:mjohnson@sonnenschein.com); and The Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) this 30<sup>th</sup> day of October, 2009.

**/s/ Jennifer Hernandez**