

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

In the Matter of the Application of)
BullsEye Telecom, Inc.)
To Expand its Certificate of Service Authority to) Case No. CA-2011-0292
Provide Basic Local Exchange Telecommunications)
Service in the State of Missouri and to Classify)
Said Service and the Company as Competitive)

**APPLICATION TO EXPAND CERTIFICATE
OF SERVICE AUTHORITY**

COMES NOW BullsEye Telecom, Inc., ("Applicant" or "BullsEye"), by its undersigned counsel, and pursuant to sections 392.245.5 (8), 392.361, 392.410, 392.420, 392.430, 392.440, 392.450 and 392.455, RSMo. and 4 CSR 240-2.060 and 4 CSR 240-3.510, and hereby applies to expand its certificate of basic local telecommunications service authority to include provision of basic local exchange telecommunications service throughout all exchanges in the State of Missouri, as authorized by Section 392.450.3, RSMo.

Pursuant to Sections 392.420, 392.245.5(8) and 392.361, RSMo and 4 CSR 240-32.010(2), BullsEye also seeks a waiver of certain Commission rules and statutory provisions. In support of its Application, BullsEye states as follows:

1. BullsEye Telecom, Inc. is a corporation duly organized and existing under and by virtue of the laws of the State of Michigan, and is duly authorized to conduct business in Missouri. The nature of the Applicant's business is telecommunications. Applicant's principal place of business is 25925 Telegraph Road, Suite 210, Southfield, MI 48033. Its telephone number is 248-784-2500 and its toll-free customer service number is 1-877-638-2855.

2. BullsEye was previously granted certificate of service authority from the Missouri Public Service Commission to provide basic Local Telecommunications service in Case No. CA-2003-0113 (Order issued December 27, 2002) and certificate of service authority to provide interexchange services in Case No. XA-2003-0112 (Order issued October 30, 2002). Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Authority to transact business in Missouri, issued by the Missouri Secretary of State, was attached to the Application in Case No. CA-2003-0113, and is hereby incorporated by reference herein pursuant to 4 CSR 240-2.060(1)(G). BullsEye Telecom remains in "Good Standing" status with the Missouri Secretary of State's Office.

3. The certificate of service authority granted in CA-2003-0113 grants BullsEye the authority to provide basic local services in the portions of Missouri that are currently served by AT&T-Missouri, Spectra Communications Group, LLC d/b/a CenturyTel, and Embarq Missouri, Inc. d/b/a CenturyLink. Both BullsEye and its basic local services have been classified as competitive, in Case No. CA-2003-0113.

4. An officer's verification of the information contained in the Application is attached hereto.

5. All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

William D. Steinmeier
William D. Steinmeier, P.C.
P.O. Box 104595, 2031 Tower Drive
Jefferson City, Missouri (MO) 65110-4595
Telephone: (573) 659-8672
Facsimile: (573) 636-2305

With a copy to:

Robin Norton
Consultant to BullsEye Telecom, Inc.
Technologies Management, Inc.

2600 Maitland Center Parkway, Suite 300
Maitland, Florida (FL) 32751
Telephone: (407) 740-3004
Facsimile: (407) 740-0613

All inquiries or communications regarding the ongoing operations of BullsEye should be addressed to:

Richard Koslowski
Vice President – Finance
BullsEye Telecom, Inc.
25925 Telegraph Road, Suite 210
Southfield, Michigan (MI) 48033
Telephone: (248) 784-2500
Facsimile: (248) 784-2686

6. By this Application, and pursuant to Section 392.450.3, RSMo, BullsEye requests an expansion of its certificate of service authority to provide competitive facilities-based and resold basic local exchange services to customers throughout all exchanges in the state of Missouri of all incumbent local exchange companies (ILECs). The exchanges in which BullsEye seeks authority are listed in the approved tariffs of the ILECs, and will be listed in Applicant's basic local service tariff. BullsEye's proposed service areas will follow the respective exchange boundaries of each incumbent LEC and shall be no smaller than an exchange as required by Section 392.455(3), RSMo.

7. Pursuant to this Application, BullsEye seeks authority to offer and provide all forms of facilities-based and resold basic local telecommunications service to customers within Missouri as defined in 386.020(4) RSMo.

8. Applicant continues to possess sufficient technical and managerial resources and abilities to provide basic local telecommunications service as required by Section 392.455(1), RSMo, as found by the Commission in Case No. CA-2003-0113. A listing of Applicant's current principal management employees and their qualifications is attached as **Exhibit A.**

9. Applicant continues to possess the necessary financial resources and abilities to provide the services it proposes as required by Section 392.455(1), RSMo and has the necessary capital to conduct its proposed operations in Missouri, as found in Case No. CA-2003-0113. Based on the prior determination, and Applicant's successful business since that time, BullsEye seeks a waiver of the requirement that historic and pro forma financial data be submitted under 4 CSR 240-3.510(1)(D). However, BullsEye submits an officer's affidavit concerning its technical, financial and managerial resources and abilities as **Exhibit B**.

10. BullsEye Telecom, Inc. seeks continued classification as a competitive company, including classification of its expanded basic local exchange telecommunications services as competitive, pursuant to Section 392.361 and Section 392.420, RSMo and 4 CSR 240-3.510(1)(A), with the accompanying reduced regulation that accompanies such classification. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation and that granting this request will allow greater price and service options for telephone users. In the Commission's previous orders granting certificates of service authority, the Commission classified BullsEye and its services as competitive.

11. BullsEye Telecom, Inc. will offer basic local telecommunications services as a separate and distinct service in accordance with applicable law. BullsEye will give consideration to equitable access for all Missourians, regardless of where they might reside or their income, to affordable telecommunications services in BullsEye's proposed service areas in accordance with the law.

12. Applicant is willing to comply with all applicable Commission rules, except those that are waived, in providing basic local service in the expanded service area.

Specifically, BullsEye will file and maintain tariffs and meet applicable minimum standards established by the Commission. BullsEye will make reports to and other informational filings with the Commission as required. Pursuant to Section 392.420, RSMo and Section 392.245.5(8), which provide good cause for this request, Applicant requests the following statutes and regulations be waived for BullsEye Telecom, Inc. and its basic exchange service offerings:

STATUTES

- | | |
|-----------|---|
| 392.210.2 | - Uniform System of Accounts |
| 392.240.1 | - Rates-rentals-service & connections |
| 392.270 | - Valuation of property (ratemaking) |
| 392.280 | - Depreciation accounts |
| 392.290 | - Issuance of securities |
| 392.300 | - Transfer of assets and acquisition of stock |
| 392.310 | - Issuance of securities |
| 392.320 | - Stock dividend payment |
| 392.330 | - Issuance of securities, debt and notes |
| 392.340 | - Reorganization(s) |

REGULATIONS

- | | |
|--|--|
| 4 CSR 240-3.550(4) | - Held order records |
| 4 CSR 240-3.550(5)(A) | - Quality of service reports |
| 4 CSR 240-10.020 | - Depreciation fund income |
| 4 CSR 240-30.040 | - Uniform System of Accounts |
| 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 240-33.040(1) through (3) and (5) through (10) | - Billing and payment standards |
| 4 CSR 240-33.045 | - Appearance of charges on bills |
| 4 CSR 240-33.080(1) | - Company name and number on bills |
| 4 CSR 240-33.130(1), (4) and (5) | - Operator service requirements |
| 4CSR 240-32-050(4)(B) | - Limited White Pages waiver as provided in File No. IE-2009-0357 ¹ |

¹ *In the Matter of Southwestern Bell Telephone Company, d/b/a AT&T Missouri's Application for Waiver of the General Distribution Requirement of White Page Directories Under 4 CSR 240-32.050(4)(B), Order issued July 24, 2009, effective August 1, 2009.*

13. Applicant acknowledges 4 CSR 240-3.510(1)(C), which requires that a tariff and any applicable interconnection agreements must be filed with the Commission and approved before service can be provided.

14. Applicant submits that the public interest will be served by Commission approval of this Application because Applicant's proposed service will create and enhance competition and expand customer service options, consistent with the legislative goals set forth in the Telecommunications Act of 1996 and Chapter 392, RSMo. Prompt approval of this Application also will expand the availability of innovative, high quality and reliable telecommunications services within the State of Missouri.

15. Notwithstanding the provisions of Section 392.500, RSMo., as a condition of certification and competitive classification, BullsEye agrees that, unless otherwise ordered by the Commission, BullsEye's originating and terminating switched exchange access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each ILEC within those service area(s) in which Applicant seeks authority to provide service. Additionally, pursuant to the Commission's Report and Order in Case No. TO-99-596, BullsEye agrees that if the ILEC in whose service area the Applicant is operating decreases its originating and/or terminating access service rates, the Applicant shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates within thirty (30) days of the ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap on switched access rates.

16. BullsEye has no pending or final judgments or decisions against it from any state or federal agency or court that involve customer rates or service.

17. BullsEye has no annual report or assessment fees that are overdue.

18. Applicant acknowledges that 4 CSR 240-4.020 (2) requires any regulated entity to give 60-days' notice prior to filing any case "likely to be a contested case." 4 CSR 240-4.020 (2) (B) provides that a party may request a waiver of that section for good cause. Applicant hereby requests a waiver of the 60-day notice requirement because: (1) this application is unlikely to result in a hearing; (2) the typical non-contested nature of this type of application provides good cause for waiving the requirement; and (3) no communication has occurred with the Commission within the scope of 4 CSR 240-4 prior to the filing of this Application.

WHEREFORE, Applicant BullsEye Telecom, Inc. respectfully requests that the Commission: (1) grant it an expanded certificate of service authority to provide basic local telecommunications service as herein requested; (2) classify Applicant and Applicant's proposed services as competitive; (3) grant the requested waivers of aforesaid statutes and regulations; and (4) grant a waiver of 4 CSR 240-4.020 (2) if deemed applicable.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier MoBar #25689
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Email: wds@wdspsc.com

ATTORNEY FOR APPLICANT
BullsEye Telecom, Inc.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov and on the General Counsel's office at gencounsel@psc.mo.gov this 18th day of March 2011.

/s/ William D. Steinmeier

William D. Steinmeier

State of Michigan)
) ss.
County of Oakland)

VERIFICATION

Richard Koslowski, being first duly sworn, deposes and says: That he is the Vice President – Finance/Treasurer of BullsEye Telecom, Inc., the Applicant in the foregoing Application; that he has read the foregoing Application, knows the contents thereof and is authorized to verify the accuracy of same; and that the statements contained in the Application are true to his best knowledge, information and belief.

SIGNATURE: *Richard Koslowski*
Richard Koslowski

TITLE: Vice President – Finance/Treasurer
 BullsEye Telecom, Inc.

Subscribed and sworn to before me this 16 day of MARCH, 2011.

Sheila M. Gallant
Notary Public

My Commission expires: 10-1-2015

SHEILA M. GALLANT
NOTARY PUBLIC, STATE OF MI
COUNTY OF MADONIA
MY COMMISSION EXPIRES 10/1/2015
NOTARY IN COUNTY OF Oakland

Exhibit A

Management Profiles

William H. Oberlin - Chairman and Chief Executive Officer

William Oberlin, Chairman and Chief Executive Officer, is responsible for providing strategic direction, business development and leadership on technology issues. Prior to joining BullsEye he was Chief Executive Officer of Midcom Communications, which he joined in 1996. From 1988 to 1996 he played a key role in the turnaround of Allnet Communications which was sold to Frontier Communications in 1995. Mr. Oberlin began his career in a series of sales and marketing positions, first at New Jersey Bell and subsequently in senior roles at Sprint, DHL Business Systems and the U.S. operations of Cable and Wireless. He holds a bachelor's degree in economics from Rutgers University.

Tom Tisko - Vice President of Business Operations

Tom Tisko, Vice President of Business Operations, began his career in information systems and operations management at Electronic Data Systems Corporation where he was responsible for leading and managing teams of systems engineers in resource allocation, technical guidance and career development. From 1995-1999 he served as Operations Manager, and later as General Manager, of AdVal Communications where he was responsible for the successful operation of order management and billing systems, back-office IT functions and customer service. Mr. Tisko holds a combined BS in Computer Science and Business Administration from Michigan Technological University and an MBA from Golden Gate University.

Bill R. Edwards - Vice President of Customer Operations

Bill Edwards, Vice President of Customer Operations, brings twenty years of telecommunications service experience to BullsEye Telecom. His work at BullsEye has included key contributions to the design, development and operation of a highly automated order management, service provisioning and customer service infrastructure. His responsibilities include the continued development and operation of many of the non-IT-related components of the Company's back office.

Exhibit A

Management Profiles

Rosemary P. Albanese - Vice President of Client Service

Rosemary P. Albanese, Vice President of Client Service, has over ten years experience in the Inbound/Outbound telemarketing arena overseeing the selling and servicing of several telecommunications clients. She worked at The Faneuil Group from 1992-1998 as the Director of Quality and Change Management where she ensured consistency in processes and procedures for multiple North American call centers, and instituted Best Practices throughout the company. Between 1998-2003, Ms. Albanese served as Vice President of Operations for Telemarketing Concepts. Her responsibilities included the effective and profitable running of all U.S. Call Centers, and the executive guidance for all major company accounts. She also provided all supervisor/management training. At BullsEye, Ms. Albanese is responsible for all Corporate Quality initiatives, Customer Service, billing, Sales Operations and Training. She has a B.A. from Illinois State University.

David S. Bailey – Vice President Business Development

David Bailey is responsible for the Marketing, Product Development, Channel Management, Business Development and Regulatory areas of BullsEye. He leads the strategic development of the Company and its associated products, marketing, business expansion, regulatory compliance suppliers/service providers and corporate partnerships. Mr. Bailey began his 26 year career in telecommunications at MCI and has served in a variety of business and strategic leadership positions for companies including Allnet Communications, Frontier Communications and LDMI Telecommunications.

Exhibit B

**Officer's Affidavit Concerning BullsEye's
Technical, Financial and Managerial Resources and Abilities**

State of Michigan)
County of Oakland) ss.
)

AFFIDAVIT

Richard Koslowski, known to the undersigned Notary to be a credible person and of lawful age, who being first duly sworn on his oath, deposes and says:


1. I am Vice President – Finance/Treasurer of BullsEye Telecom, Inc., the Applicant in this matter, and am authorized to make this Affidavit on behalf of BullsEye Telecom, Inc.

2. In my capacity as Vice President – Finance/Treasurer, I have executive responsibilities for the day to day financial matters associated with BullsEye Telecom, Inc.

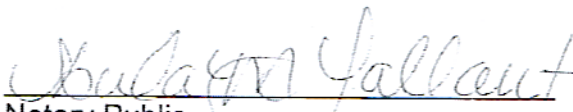
3. BullsEye Telecom, Inc. possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications services in Missouri.

4. BullsEye Telecom, Inc. has not defaulted on any of its financial obligations within the last three years.

Further Affiant sayeth not.


Richard Koslowski
Vice President – Finance/Treasurer
BullsEye Telecom, Inc.

Subscribed and sworn before me this 16 day of MARCH 2011.


Notary Public

My Commission Expires: 10-1-2015

Notary Seal:

SHEILA M. GALLANT
NOTARY PUBLIC, STATE OF MI
COUNTY OF MACOMB
MY COMMISSION EXPIRES Oct 1, 2015
ACTING IN COUNTY OF Oakland