

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

In the matter of the Application of)
Correct Solutions, LLC for)
Certificate of Service Authority to Provide)
Competitive Intrastate Interexchange)
Telecommunications Services including)
Operator Services within the State of)
Missouri)

File No. XA-2013-0507

APPLICATION

COMES NOW Correct Solutions, LLC ("Correct Solutions"), by its undersigned counsel, and pursuant to Sections 392.245.5 (8), 392.361, 392.410, 392.420, 392.430, 392.440 and 392.450 RSMo., the Federal Telecommunications Act of 1996, 4 CSR 240-2.060 and 4 CSR 240-3.510, and files this verified Application requesting that the Missouri Public Service Commission (hereinafter, "the Commission") issue an order: (a) granting Certificate of Service Authority to provide competitive intrastate interexchange telecommunication services, including operator services, between and among locations within the State of Missouri; (b) granting competitive status to Applicant and Applicant's requested services; and (c) waiving certain Commission rules and statutory provisions pursuant to Sections 392.420, 392.361 and 392.245.5 (8), RSMo, consistent with the Commission's past treatment of other certificated providers of competitive telecommunications services. In support of its Application, Applicant provides the following information:

1. Correct Solutions, LLC was incorporated on February 13, 2012, under the laws of the State of Louisiana. The legal name and principal office or place of business of the applicant is:

Correct Solutions, LLC
192 Bastille Lane, Suite 200
Ruston, LA 71270
Phone: 318-232-1525
Fax: 318-232-1501
Toll-Free: 866-367-9228

The nature of the Applicant's business is telecommunications. Applicant is qualified to transact business in the State of Missouri and holds a certificate of authority as a foreign corporation to transact business in the State of Missouri, which is attached hereto as **Exhibit I** and incorporated herein by reference.

Copies of correspondence, communications and orders and decisions of the Commission are to be sent to the following:

William D. Steinmeier
William D. Steinmeier, P.C.
2031 Tower Drive
P.O. Box 104595
Jefferson City, MO 65110-4595
Phone: 573-659-8672
Fax: 573-636-2305
Email: wds@wdspc.com

With a copy to:

Robin Norton, Consultant
Technologies Management, Inc.
2600 Maitland Center Parkway, Suite 300
Maitland FL, 32751
Phone: 407-740-3004
Fax: 407-740-0613
Email: rnorton@tminc.com

2. The name and address of Applicant's registered agent in the State of Missouri is:

National Registered Agents, Inc.
300 B East Hight Street
Jefferson City, MO 65101

3. With this Application, Correct Solutions, LLC proposes to provide automated operator assisted calling services to inmates of confinement institutions throughout the State of Missouri on both a collect and prepaid basis. All services will be offered twenty-four (24) hours per day, seven (7) days a week. Detailed information regarding these services along with proposed rates and charges are provided in the Company's tariff included as **Exhibit II** to this petition.

Correct Solutions will provide correctional and confinement institutions with sophisticated premises equipment that permits inmates to make outgoing, collect or prepaid calls without the assistance of a live operator. Correct Solutions systems provide a number of controls and restrictions that serve to reduce or eliminate fraudulent use of telephone systems. These restrictions also provide the correctional institution with increased control over the use of the telecommunications services by inmates confined within. Correct Solutions telephone instruments are placed in detention areas such as cell blocks or day rooms. Each instrument is connected to a central control unit which restricts and controls calls placed by inmates. Correct Solutions system and services allow inmates to remain in contact with family, friends and other associates while still providing facility administrators with the necessary control over inmate communications.

Calls placed by inmates from the confinement facility are routed over the facilities of the local exchange carrier serving the confinement facility and Correct Solutions underlying carrier. Correct Solutions system is designed so that calls are completed only to those called parties who specifically accept the call. Equipment utilized by Correct Solutions requires a positive response from the called party before the connection is established and billing can begin.

In addition to call processing, Correct Solutions systems offer restrictive call blocking and screening. These features provide the correctional facility with the maximum degree of control over telecommunications services and help to minimize fraud. Call blocking prevents calls to directory assistance, "0-", 800 numbers, pay-per-call services, and emergency numbers (including 911) in order to reduce prank calls and fraudulent use of long distance services. Access to other interexchange carriers is also denied. Call screening serves to eliminate harassing or threatening calls to individuals such as judges, sheriffs, witnesses or jury members. These two features also allow the institution to enforce telephone curfews (without manual intervention) by pre-setting the hours during which the system will process calls from a given telephone instrument. Correct Solutions system collects and stores call detail information for each call. For collect calls, these call records are retrieved by Correct Solutions and are submitted for billing to the called party's local exchange carrier through Correct Solutions billing agent.

For billing inquiries, customers are initially directed to Correct Solutions billing agent whose toll-free number is printed on each customer bill. The billing agent is authorized to investigate complaints and adjust customer bills within certain parameters set by Correct Solutions. Should an inquiry exceed the authority

delegated to Correct Solutions, the customer is referred to Correct Solutions in-house Customer Service Department for further assistance. Correct Solutions Customer Service Department handles all inquiries regarding prepaid calls.

Correct Solutions intends to resell the services of authorized carriers. Correct Solutions does not propose to own switching equipment or transmission facilities. Customers may reach the Company at the toll-free Customer Service number 1-866-267-9228. In addition, Customers may contact the Company in writing at Correct Solutions, LLC, 6900 192 Bastille Lane, Suite 200 Ruston, LA 71270.

4. With this application, Correct Solutions proposes to provide automated operator assisted calling services to inmates of confinement institutions throughout the State of Missouri. All services will be offered twenty-four (24) hours per day, seven (7) days a week originating and terminating throughout the State of Missouri.
5. Correct Solutions possesses managerial and technical expertise to provide resale interexchange and operator assisted telecommunications services throughout the State of Missouri.
6. Correct Solutions possesses the financial ability to provide the requested services.
7. Correct Solutions requests classification as a competitive telecommunications company operating within the State of Missouri. Correct Solutions further requests classification of services described in their tariff as competitive services.
8. Applicant will offer automated operator-assisted calling services to inmates in confinement institutions within the State of Missouri. Applicant proposes to conduct its operator services pursuant to 4 CSR 240-33.130 and Section 392.515, except as such do not apply to institutional calling services . Specifically:

- * All calls are branded before call charges are incurred.
- * Rates, billing method and complaint resolution procedures are disclosed upon request. This service is available at no charge, 24 hours per day.
- * Applicant is identified on the end user bill.
- * No location surcharges are collected by Applicant for intrastate Missouri calls.

Applicant uses reliable answer detection techniques and Applicant will not knowingly charge for incomplete calls. If for any reason a caller believes he or she has been charged for an uncompleted call, Applicant will issue credit for the charges under all reasonable circumstances.

9. Applicant respectfully requests, pursuant to Sections 392.420, 392.361 and 392.245.5 (8), RSMo, that the Commission suspend or waive the application of the following rules and statutory provisions as they relate to the regulation of the applicant:

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,

392.340	-	Bonds, Notes, etc.) Company Reorganization(s)
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COMMISSION 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 <i>except for (5)(B),(D) and (E)</i>	-	Telco Records and Reports
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 <i>Except 32.140 and 32.150(1)</i>	-	Prepaid Calling Cards
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

4 CSR 240-33.050	-	Placement of Charges on Bills
4 CSR 240-33.060	-	Deposits
4 CSR 240-33.070	-	Residential Customer Inquiries
4 CSR 240-33.080	-	Discontinuance of Service
	-	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 <i>except (2)</i>	-	Payphone Requirements
4 CSR 240-33.150	-	"Anti-Slamming" Requirements
4 CSR 240-33.160	-	Customer Proprietary Network Information

10. Pursuant to 4 CSR 240-3.510(1)(C), Correct Solutions submits with this Application its proposed tariff (**Exhibit II**). Correct Solutions' tariff contains the rules and regulations applicable to users of its service, a description of the services offered, and a list of rates associated with such services.
11. Applicant will not unjustly discriminate among its customers, which discrimination is prohibited pursuant to Section 392.200, RSMo.
12. Correct Solutions currently does not have any pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or courts which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application.
13. Applicant has no annual reports or regulatory assessment fees that are overdue in Missouri.
14. 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 service options in the correctional calling industry.

WHEREFORE, Applicant, Correct Solutions, LLC, respectfully requests the Commission to issue an order: (a) granting it certificate of service authority to offer competitive intrastate interexchange telecommunication services, including operator services, within the state of Missouri; (b) classifying Applicant and Applicant's proposed services as competitive; (c) granting the requested waivers of aforesaid statutes and regulations; and (d) including such further orders as the Commission deems appropriate.

Respectfully submitted,

/s/ William D. Steinmeier

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ATTORNEY FOR APPLICANT
Correct Solutions, LLC

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 Commission's General Counsel's office at staffcounsel@psc.mo.gov this 31st day of May 2013.

/s/ William D. Steinmeier

William D. Steinmeier

VERIFICATION

(Filed separately as pdf document.)

**APPLICATION OF
CORRECT SOLUTIONS, LLC**

Exhibit I

Certificate of Authority to Transact Business in Missouri

(Filed separately as pdf document.)

**APPLICATION OF
CORRECT SOLUTIONS, LLC**

Exhibit II

Proposed Tariff

(Filed separately as pdf document.)