

Memorandum

To: Missouri Public Service Commission Official Case File
Case No. CN-2013-0121
Tariff No. YC-2013-0165

Date: 10-12-12

From: Kari Salsman
Telecommunications Unit
Tariff, Safety, Economic and Engineering Analysis/Date

Subject: Staff Recommendation for Approval of Name Change

Existing Name of Company: dPi Teleconnect, LLC
Proposed Name of Company: Unity Telecom, LLC

On October 1, 2012, dPi Teleconnect, LLC (“company”) filed a letter and tariff sheets to change its name to Unity Telecom, LLC. The Staff would like to make the Commission aware of the following issues with this company:

- The company has failed to pay its Missouri PSC assessment for FY-2013.
- The company has not adequately resolved deficiencies to its 2010 and 2011 annual reports.
- The Missouri USF Administrator was attempting to conduct an audit of the company for Missouri USF purposes but was unable to contact the company. The Missouri USF Administrator repeatedly tried to contact the company on Aug. 30, Sept. 7 and Sept. 17; however, all emails to the Company were returned as undeliverable. Only recently after Staff’s involvement has the company attempted to update its EFIS contacts and provide the requested information to the Missouri USF Administrator.

Although Staff is not recommending the Commission suspend the tariffs, which will become effective October 14, Staff recommends the Commission direct the company to respond to the foregoing statements.

Review Items

Administrative:

- No applications to intervene filed.
- Evidence of registration of the name change with the Missouri Secretary of State has been submitted.

- Customers have been notified. (4 CSR 240-3.545(20))
- Customers will be notified at or before the next billing cycle of any name change. (4 CSR 240-3.545(20))
- Other (Specify)

Tariff:

- Adoption Notice

Appendix A

- Revised Title Page (see tariff review section below)
- New Tariff (see tariff review section below)

Tariff review items (as applicable):

- Not Applicable – New tariff was not submitted.
- Properly formatted: (Company name, PSC MO No., Page #, Page revision #, proposed effective date)
- Identifies competitive classification.
- Identifies waivers granted.
- Customer specific pricing, if proposed, limited for private line, special access or Centrex-like services or to business customers in exchanges where the incumbent local exchange company has had its business services declared competitive pursuant to Section 392.245. (392.200(8)).
- Proposed rates do not establish geographic deaveraged rates (if not checked, explain in attachment). (392.200(4)).
- If an alternative operator service provider (receives more than 40% of revenues from traffic aggregators) operator service rates do not exceed: Person-to-Person (\$10.00), Station-to-Station/card (\$5.50). (392.515(1))

Tariff review items (as applicable, only for CLECs):

- Tariff clearly indicates areas offering local service area
(____AT&T Missouri, ____CenturyTel, ____ Sprint, ____ Spectra, ____ Other)
- Tariff offers local service as a separate and distinct service.
- Switched access service rates capped at ILEC's rates.

Are there additional recommendations or special considerations?

No

Yes

Under penalty of perjury, I affirm that the above statement is true and correct.

Kari Salsman