

In the Matter of the Application of  
**Global Tel\*Link Corporation**  
for Waiver of Commission Rules  
and Statute

2. Corporate Structure: GTL is a Delaware corporation authorized to conduct business within the State of Missouri. A copy of its Certificate of Good Standing is attached hereto and incorporated herein by reference as **Exhibit A**. Further, GTL was granted a Certificate of Service Authority to Provide Intrastate Interexchange Telecommunications services in the State of Missouri in Case No. TA-96-152, by Order effective December 26, 1995. GTL currently provides managed inmate services in the State of Missouri.

3. Correspondence: All communications, notices, orders and decisions respecting this Application and proceeding should be addressed to:

Mark P. Johnson  
Sonnenschein Nath & Rosenthal  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
Telephone: (816) 460-2424  
Facsimile: (816) 531-7545  
Electronic mail: mjohnson@sonnenschein.com

4. Classification of Services as Competitive: In the Commission's Orders in Case No. TA-96-152, the Commission classified GTL and its services as competitive.

5. Pending Actions: GTL does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or customer rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

6. Annual Reports and Fees: GTL does not have any overdue annual reports or assessment fees.

7. Waiver of Rules: The Commission has previously waived certain statutes and regulations as to GTL, but because of the passage of time, the list is not as comprehensive as would be consistent with current Commission practices. Under Section 392.245.5(8), RSMo, "...all alternative local exchange telecommunications companies shall not be required to comply with customer billing rules, network engineering and maintenance rules, and rules requiring the recording and submitting of service objectives or surveillance levels established by the commission . . ." Section 392.420, RSMo, provides that "... for all existing alternative local exchange telecommunications companies, the commission shall waive, at a minimum, the application and enforcement of its quality of service and billing standards rules, as well as the provisions of subsection 2 of section 392.210, subsection 1 of section 392.240, and sections 392.270, 392.280, 392.290, 392.300, 392.310, 392.320, 392.330, and 392.340 . . ." As these rules and statutes may be waived for local exchange carriers, as an interexchange carrier GTL seeks a Commission Order waiving the applicability of the following rules and statute:

4 CSR 240-3.550(4))	Telecommunications Company Records and Reports
4 CSR 240-3.550(5)(A)	Telecommunications Company Records and Reports
4 CSR 240-32.060	Engineering and Maintenance Standards
4 CSR 240-32.070	Quality of Service
4 CSR 240-32.080	Service Objectives and Surveillance Levels
4 CSR 240-33.040(1) - (3) and (5) - (10)	Billing and Payment Standards for Residential Customers
4 CSR 240-33.045	Requiring Clear Identification and Placement of Separately Identified Charges on Customer Bills
4 CSR 240-33.080(1)	Disputes by Residential Customers
4 CSR 240-33.130(1)	Operator Service

4 CSR 240-33.130(4)	Operator Service
4 CSR 240-33.130(5)	Operator Service

Section 392.300.1 RSMo.

Per 4 CSR 240-2.061(5), good cause for granting these waivers is provided by the finding of the Missouri General Assembly in HB 1779 that alternative local exchange companies should be relieved of certain regulatory requirements. As an alternative local exchange telecommunications company, GTL is entitled to waiver of the listed requirements. No public utility will be affected by the requested waiver of these statutes and regulations.

8. Compliance with Orders and Regulations: GTL will comply with all applicable orders and regulations of the Commission.

9. Tariff Revisions: GTL also requests the Commission approve the separately filed revised tariff to reflect the waivers granted herein. A specimen copy of the proposed revised tariff cover page is attached hereto as **Exhibit B**.

WHEREFORE, Global Tel\*Link Corporation respectfully requests that the Commission issue an Order to grant waiver of the identified rules and statute, approve the separately filed tariff revision to reflect these waivers, and grant such other and further relief to Global Tel\*Link Corporation as the Commission deems just and proper.

Respectfully submitted,

/s/ Mark P. Johnson

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(816) 460-2545  
(816) 460-531-7545 (FAX)  
Attorneys for GLOBAL TEL\*LINK  
CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been mailed electronically, this 26<sup>th</sup> day of February, 2010, to:

Office of the Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102-2230

General Counsel  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102-2230

/s/ Mark P. Johnson

Attorney for Global Tel\*Link Corporation.

**VERIFICATION**

STATE OF MISSOURI       )  
  ) ss.  
COUNTY OF JACKSON    )


COMES NOW Mark Johnson, being of lawful age and duly sworn, who swears and affirms as follows:

1. My name is Mark Johnson, and I am an attorney for Global Tel\*Link Corporation ("Applicant"). In that capacity, I am authorized to verify the statements contained in the Application above, and the information contained therein, on behalf of Applicant.

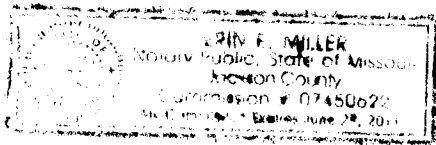
2. The information contained in the above-described document is true and accurate to the best of my knowledge and belief.

  
\_\_\_\_\_  
Mark P. Johnson

Subscribed and sworn to before me this 16<sup>th</sup> day of February, 2010.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



**EXHIBIT A**

**CERTIFICATE OF GOOD STANDING**

# State of Missouri



Robin Carnahan  
Secretary of State

## CERTIFICATE OF RESCISSION

I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, hereby certify that the administrative dissolution or forfeiture entered against

*GLOBAL TEL LINK CORPORATION*

using in Missouri the name

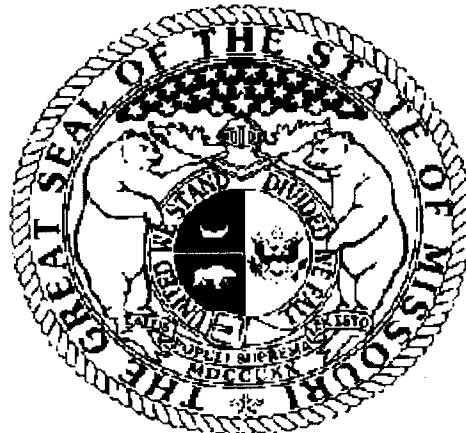
*GLOBAL TEL LINK CORPORATION*  
*F00378720*

on the 4th day of September, 2002, as provided in the General and Business Corporation Law was this day rescinded, and said corporation was on this date hereby restored to good standing on the records of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 8th day of April, 2005.

*Robin Carnahan*

Secretary of State





**EXHIBIT B**

**TARIFF REVISIONS**

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COMPETITIVE TELECOMMUNICATIONS COMPANY WAIVERS

Global Tel\*Link Corporation is classified as a competitive telecommunications company in Missouri for which the following statutory and regulatory requirements are waived:

<u>Rule/Statute</u>	
392.210.2	- Uniform System of Accounts
392.240(1)	- Just and Reasonable Rates
393.270	- Ascertain Property Values
392.280	- Depreciation Accounts
392.290	- Issuance of Securities
392.300.2	- Acquisition of Stocks
392.310	- Issuance of stock and debt
392.320	- Stock dividend payment
392.330	- Issuance of securities, debt and notes
392.340	- Reorganizations
4 CSR 240-10.020	- Depreciation fund income
4 CSR 240-30.040	- Uniform system of accounts

In Docket No. \_\_\_\_\_, the Commission granted waiver of the following rules and statute:

4 CSR 240-3.550(4)  
4 CSR 240-3.550(5)(A)  
4 CSR 240-32.060  
4 CSR 240-32.070  
4 CSR 240-32.080  
4 CSR 240-33.404(1)-(3) and (5)-(10)  
4 CSR 240-33.045  
4 CSR 240-33.080(1)  
4 CSR 240-33.130(1)  
4 CSR 240-33.130(4)  
4 CSR 240-33.130(5)  
Section 392.300.1, RSMo.

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Issued: February 26, 2010

Effective: March 29, 2010

Issued By:

Craig Ferguson, President  
2609 Cameron Street  
Mobile, Alabama 36607