

# NEWMAN, COMLEY & RUTH P.C.

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January 7, 2010

The Honorable Colleen M. Dale  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: New Global Telecom, Inc.

Dear Judge Dale:

New Global Telecom, Inc. ("NGT") hereby submits the enclosed registration documentation with the Missouri Public Service Commission. NGT is a provider of wholesale and retail hosted Voice over Internet Protocol ("VoIP")-enabled services. As an interconnected VoIP provider as defined by the Federal Communications Commission ("FCC"), NGT is subject to exclusive jurisdiction of the FCC pursuant to the 2004 *Vonage Order*,<sup>1</sup> and subsequent federal court decisions that have enjoined state regulatory commissions from imposing traditional state telecommunications requirements on such services.<sup>2</sup>

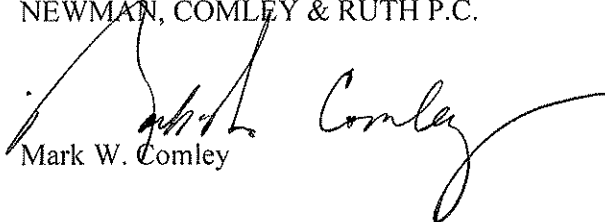
By filing the attached registration form, NGT does not waive its position that the Commission lacks regulatory jurisdiction over NGT. NGT provides the information in the attached documentation voluntarily in order to maintain the accuracy of the Commission's records.

Should you have any questions concerning this filing, please do not hesitate to contact the undersigned. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel  
General Counsel's Office  
Monique Byrnes

<sup>1</sup> See *Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, Memorandum Opinion and Order, 19 FCC Red 22404 ("Vonage Order").

<sup>2</sup> See, e.g., *Vonage Holdings Corp. v. Minn. Pub. Utils. Comm'n*, 290 F. Supp. 2d 993, 999 (D. Minn. 2003), *aff'd*, 394 F.3d 568 (8<sup>th</sup> Cir. 2004); *Vonage Holdings Corp. v. N. Y. State Pub. Serv. Comm'n*, No. 04 Civ 4306 (S.D.N.Y. July 16, 2004) (Order of Magistrate Judge Eaton). See also *Vonage Holdings Corp. v. Neb. Pub. Serv. Comm'n*, 564 F.3d 900 (8<sup>th</sup> Cir. 2009), *aff'g* 543 F.Supp. 2d 1062 (D. Neb. 2008); *N.M. Pub. Regulation Comm'n v. Vonage Holdings Corp.*, Civ. No. 08-607 WJ/RHS, Memorandum Opinion and Order (D.N.M. July 28, 2009).