

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED
MAY 17 11:18
COMMUNICATIONS

DATE: MAY 17, 2001

TO: DIRECTOR, DIVISION OF RECORDS AND REPORTING (BAYÓ)

FROM: DIVISION OF LEGAL SERVICES (BANKS) *PPB BR*
DIVISION OF COMPETITIVE SERVICES (M. WATTS, TRUBELHORN) *NW PLU*

RE: DOCKET NO. 001329-TI - INITIATION OF SHOW CAUSE PROCEEDINGS AGAINST RADIANT TELECOM, INC. FOR APPARENT VIOLATION OF RULES 25-4.043, F.A.C., RESPONSE TO COMMISSION STAFF INQUIRIES, 25-24.480, F.A.C., RECORDS & REPORTS; RULES INCORPORATED, 25-24.915, F.A.C., TARIFFS AND PRICE LISTS, 25-24.920, F.A.C., STANDARDS FOR PREPAID CALLING SERVICES AND CONSUMER DISCLOSURE, AND 25-4.0161, F.A.C., REGULATORY ASSESSMENT FEES; TELECOMMUNICATIONS COMPANIES.

AGENDA: 05/29/01 - REGULAR AGENDA - ISSUE 1 - FINAL ACTION - ISSUE 2 - PROPOSED AGENCY ACTION (PAA) - INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\001329S1.RCM

CASE BACKGROUND

- May 26, 1999 - Radiant Telecom, Inc. (Radiant) obtained Interexchange (IXC) Telecommunications certificate number 6098.
- December 8, 1999 - The Division of Administration mailed the 1999 Regulatory Assessment Fee (RAF) return notice. Payment was due by January 31, 2000.
- February 29, 2000 - The Division of Administration mailed the delinquent notice for the 1999 RAF.

DOCUMENT NUMBER-DATE

06184 MAY 17 01

FPSC-RECCROS/REPORTING

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- June 12, 2000 - Staff mailed Radiant a letter detailing three issues that the company needed to address: a consumer complaint, updating its tariff to include pre-paid calling services (PPCS), and updating its Mailing and Liaison information. Staff requested a response by June 26, 2000.
- July 26, 2000 - Because Radiant failed to respond to staff's June 12, 2000, letter, staff contacted Radiant. Staff gave Radiant until August 2, 2000, to respond.
- August 25, 2000 - Staff conducted a Timing and Billing Reconciliation test on a prepaid phone card issued by Radiant Telecom, Inc.
- September 6, 2000 - Radiant did not respond to staff's inquiry, therefore, staff opened this docket to initiate show cause proceedings against Radiant for apparent violation of Commission rules as summarized in Table 1, page 4.
- September 14, 2000 - Staff filed its recommendation for presentation to the Commission at the September 26, 2000, Agenda Conference.
- September 21, 2000 - Staff received a settlement offer from Radiant and a request to defer this docket from the September 26, 2000, Agenda Conference. The request to defer was granted by the Chairman. Radiant reported an amount of \$4,172,423.55 in Florida gross operating revenues for 1999.
- October 2, 2000 - Radiant submitted a check for \$7,500 in an attempt to settle this docket. The check was deposited by the Division of Administration on October 3, 2000.
- December 14, 2000 to January 12, 2001 - Radiant submitted data for refund calculations (Attachment A, pages 10-11).
- April 18, 2001 - Radiant submitted a revised settlement proposal (Attachment B, pages 12-15).
- May 17, 2001 - Radiant reported an amount of \$31,873,653.32 in Florida gross operating revenues for 2000.

The Commission is vested with jurisdiction over these matters pursuant to Sections 364.01, 364.04, 364.08, 364.183, 364.336 and 364.337, Florida Statutes. Accordingly, staff believes the following recommendations are appropriate.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission accept the revised settlement offer proposed by Radiant Telecom, Inc. to resolve the apparent violation of Rules 25-4.043, F.A.C., Response to Commission Staff Inquiries, 25-24.480, F.A.C., Records & Reports; Rules Incorporated, 25-24.915, F.A.C., Tariffs and Price Lists, 25-24.920, F.A.C., Standards for Prepaid Calling Services and Consumer Disclosure, and 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies?

RECOMMENDATION: Yes. The Commission should accept the company's settlement proposal, which includes a \$7,500 voluntary contribution to the General Revenue Fund, paid prematurely on October 2, 2000. The contribution was forwarded to the Office of the Comptroller for deposit in the State of Florida General Revenue Fund. The company has waived any objections to the administrative cancellation of certificate number 6098 in the event its offer is approved by the Commission and it fails to comply with the terms of its settlement offer. **(Banks/M. Watts)**

STAFF ANALYSIS: On June 12, 2000, staff sent a letter to Radiant requesting that Radiant address three issues: a consumer complaint, updating its tariff to include PPCS, and providing the correct Mailing and Liaison information to the Commission. When no response was received, staff called Radiant to ask about its response. Mr. Ken Jacobi, representing Radiant, requested an extension of the deadline to reply to staff to August 2, 2000, and advised staff that another person in the company, Mr. Omar Pesantes, would contact staff. Staff reached Mr. Pesantes on July 31, 2000, and faxed a copy of the June 12, 2000, letter to him. No response was received until after staff filed its show cause recommendation on September 14, 2000.

Staff acquired a Radiant prepaid phone card in Florida with copies of the point-of-sale display to evaluate the service based on the information provided on the display and on the card since PPCS was not included in its tariff. Staff found five apparent violations of Rule 25-24.920, Florida Administrative Code, on the printed material, which are detailed in Table 1 on page 4 of this recommendation.

Staff also made test calls to determine if the calls were charged according to the rates set forth in the printed material, since the company did not include PPCS in its tariff on file with the Commission. Staff made calls of 58- to 61-second duration

until the card had a zero balance. The test call data indicated that the value of the card was reduced erratically. The time duration for each call made by staff was consistent, yet the number of minutes deducted for each call varied from zero to 46, with most calls resulting in 33 minutes being deducted from the balance.

Also, at the time that this docket was opened, Radiant had not paid its 1999 Regulatory Assessment Fees (RAF) with the associated penalty and interest. Table 1 summarizes Radiant's apparent violations.

TABLE 1 - Summary of Radiant's Apparent Rule Violations

| RULE | APPARENT VIOLATION |
|-------------------------|---|
| 25-4.043, F.A.C. | Did not respond to staff's June 12, 2000, letter |
| 25-24.480, F.A.C. | Incorrect contact information in the Master Commission Directory |
| 25-24.915, F.A.C. | PPCS not included in tariff |
| 25-24.920(1)(a), F.A.C. | Certificated name not on prepaid phone card |
| 25-24.920(2)(b), F.A.C. | All surcharges not disclosed on point-of-sale material |
| 25-24.920(6), F.A.C. | Point-of-sale material states that rates are subject to change without notice |
| 25-24.920(7), F.A.C. | Billing in three-minute increments instead of one-minute increments |
| 25-24.920(9), F.A.C. | Rounding up three minutes instead of one minute |
| 25-4.0161, F.A.C. | Regulatory assessment fees |

On April 18, 2001, staff received Radiant's revised settlement offer (Attachment B, pages 12-15). In its settlement offer, Radiant proposed the following:

- A monetary contribution of \$7,500 (received on October 2, 2000);
- To file an updated tariff that accurately discloses its service offerings and prices;
- To revise its point-of-sale materials to conform to its tariff and to the requirements of Rule 25-24.920, Florida Administrative Code, Standards for Prepaid Calling Services and Consumer Disclosure;

- To pay all past due Regulatory Assessment Fees with the associated penalty and interest;
- To keep its contact information updated in accordance with 25-24.480, Florida Administrative Code, Records & Reports; Rules Incorporated;
- To timely respond to Commission staff inquiries and to set up a procedure for handling all customer complaints and inquiries;
- To provide Commission staff with a list of names and addresses where its prepaid cards are sold in Florida;
- To waive its objection to the administrative cancellation of certificate number 6098 in the event the Commission accepts its offer and it fails to comply with the terms it has offered.

Radiant has already updated its contact information, paid its 1999 RAF with penalty and interest, and submitted the required tariff revisions. Staff recommends that the Commission accept the company's settlement proposal, which includes a \$7,500 voluntary contribution to the General Revenue Fund, paid prematurely on October 2, 2000. The contribution was forwarded to the Office of the Comptroller for deposit in the State of Florida General Revenue Fund. The company has waived any objections to the administrative cancellation of certificate number 6098 in the event its offer is approved by the Commission and it fails to comply with the terms of its settlement offer.

ISSUE 2: Should the Commission accept Radiant Telecom, Inc.'s offer of refund and refund calculation of \$32,887.61, plus interest of \$2,492.27, for a total of \$35,379.88, for overcharging customers for charges not disclosed at the point of sale between January 1, 1999, and October 31, 2000?

RECOMMENDATION: Yes. The Commission should accept Radiant's calculation of \$32,887.61, adding interest of \$2,492.27, for a total of \$35,379.88, and its proposal to remit the refund amount by July 31, 2001, to the Commission to be forwarded to the Comptroller for deposit in the General Revenue Fund, pursuant to Section 364.285(1), Florida Statutes, for overcharging customers for charges not disclosed in its tariff or at the point of sale between January 1, 1999, and October 31, 2000. The refund should be forwarded to the Comptroller for deposit in the General Revenue Fund, since the company has no records that would identify its end customers and therefore cannot refund the overcharges directly. Radiant should submit a final report as required by Rule 25-4.114, Florida Administrative Code, Refunds, by July 31, 2001. **(Banks/M. Watts)**

STAFF ANALYSIS: Rule 25-24.920, Florida Administrative Code, Standards for Prepaid Calling Services and Consumer Disclosure, requires, among other things, that the rates and charges for a prepaid calling card be clearly disclosed to the consumer at the point of sale so that the consumer can make an informed decision prior to purchase. Since Radiant did not have its PPCS offerings listed in its tariff, staff compared the charges listed in the company's point-of-sale materials to the requirements established in Rule 25-24.920, Florida Administrative Code.

Based on the comparison, it appeared that Radiant was charging a variable service fee that was a percentage of the total cost of the call and an undisclosed amount for maintenance fees in apparent violation of Rule 25-24.920(2)(b), Florida Administrative Code. In addition, it appeared that Radiant was charging in three minute increments and rounding to the next third minute in apparent violation of Rules 25-24.920(7) and (9), Florida Administrative Code. Further, it appeared that the rates Radiant was charging exceeded the amounts disclosed on the point-of-sale materials and those allowed by Rules 25-24.920(7) and (9), Florida Administrative Code, resulting in overcharges to the customers.

On October 16, 2000, staff met with Mr. Korhan Aydin and Mr. Kenneth Jacobi of Radiant to discuss settlement of the issues in this docket and advised them of the requirement to refund

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overcharges in accordance with Rule 25-4.114, Florida Administrative Code. During the meeting, Mr. Aydin provided staff with all of the charges and conditions associated with the cards. Staff identified three areas of overcharges which were: three-minute increment billing; variable service fees; and maintenance fees. Mr. Aydin advised staff that, upon his return to his office, he would immediately reprogram his software to remove these charges and would begin calculations of the overcharges for refund.

The refund calculations for the three-minute increment and variable service fee overcharges (Attachment A, page 10) were submitted to staff on December 14, 2000. Based on the calculations, Radiant had overcharged consumers a total of \$6,525.01 on intrastate calls due to billing in three minute increments versus a one minute increment, as required by Rule Nos. 25-24.920(7) and (9), F.A.C. The variable service fee overcharges of \$10,973.72 reflect the entire amount that was charged on all intrastate calls.

Maintenance fees were deducted weekly or monthly beginning with the first use of a card and were not associated with the type of calls made on the card. The total amount of maintenance fees charged on prepaid phone cards that were sold in Florida between January 1999 and October 2000 was \$1,328,771.00 (Attachment A, page 11). Since the maintenance fees were not associated strictly with the intrastate calls within the purview of the Commission's jurisdiction, Radiant has offered an amount based on the following formula (Attachment A, page 11):

$$\text{refund} = \frac{\# \text{ intrastate calls}}{\# \text{ of total calls}} \times \text{total maintenance fees charged}$$

This formula allocates a percentage of the maintenance fees to intrastate calls equal to the ratio of intrastate calls to total calls. The use of the ratio of the number of intrastate calls to total calls made should approximate the portion of the cost that would be refundable on intrastate phone service. Staff believes that this refund calculation best approximates the appropriate refund based on the information provided.

Staff notes that Radiant has cooperated with staff to resolve the issues in this docket. After its meeting with staff, the company immediately corrected its software to eliminate the service and maintenance fees and to bill in one-minute increments on intrastate calls, and it updated its tariff to accurately reflect its service offerings and prices.

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Therefore, staff recommends that the Commission accept Radiant's calculation of \$32,887.61, adding interest of \$2,492.27, for a total of \$35,379.88, and its proposal to remit the refund amount by July 31, 2001, to the Commission to be forwarded to the Comptroller for deposit in the General Revenue Fund, for overcharging customers for charges not disclosed at the point of sale between January 1, 1999, and October 31, 2000. The refund should be forwarded to the Comptroller for deposit in the General Revenue Fund, pursuant to Section 364.285(1), Florida Statutes, since the company has no records that would identify its end customers and therefore cannot refund the overcharges directly. Radiant should submit a final report as required by Rule 25-4.114, Florida Administrative Code, Refunds, by July 31, 2001.

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ISSUE 3: Should this docket be closed?

RECOMMENDATION: No. With the approval of Issues 1 and 2, this docket should remain open pending the completion of the refund and receipt of the final report on the refund. Thereafter, this docket should be closed upon issuance of an Order consummating Issue 2, if no person whose substantial interests are affected files a protest of Issue 2. If the company fails to comply with the terms of its settlement offer and the Commission Order, Certificate Number 6098 should be canceled administratively, and this docket should be closed if no person whose substantial interests are affected files a protest of Issue 2. **(Banks)**

STAFF ANALYSIS: With the approval of Issues 1 and 2, this docket should remain open pending the completion of the refund and receipt of the final report on the refund. Thereafter, this docket should be closed upon issuance of an Order consummating Issue 2, if no person whose substantial interests are affected files a protest of Issue 2. If the company fails to comply with the terms of its settlement offer and the Commission Order, Certificate Number 6098 should be canceled administratively, and this docket should be closed if no person whose substantial interests are affected files a protest of Issue 2.

Dear Melinda,

As we had discussed, we have broken down the previous report to the programs we are running. You will also see that we have included the service fees charged on these calls on a new column on the same report. The first time the service fees are charged is late December 1999. So we are only left with the maintenance fees. Since maintenance fees are weekly or monthly, and charged regardless of the calls, we were not able to come up with a way to distribute the charges to intrastate calls on cards maintenance fees are charged. We'll need your help on this specific charge.

Best regards,

Korhan Aydin

| | <u>Diff. of bill.incr.</u> | <u>Service Fees Charged</u> |
|--------|----------------------------|-----------------------------|
| 199901 | - | - |
| 199902 | - | - |
| 199903 | - | - |
| 199904 | - | - |
| 199905 | - | - |
| 199906 | - | - |
| 199907 | - | - |
| 199908 | - | - |
| 199909 | - | - |
| 199910 | - | - |
| 199911 | - | - |
| 199912 | - | 306.00 |
| 200001 | - | 425.74 |
| 200002 | 66.88 | 440.87 |
| 200003 | 351.75 | 537.16 |
| 200004 | 474.42 | 874.35 |
| 200005 | 598.51 | 1,008.74 |
| 200006 | 830.56 | 1,273.42 |
| 200007 | 880.07 | 1,365.73 |
| 200008 | 1,042.44 | 1,457.29 |
| 200009 | 1,154.68 | 1,679.89 |
| 200010 | 1,125.70 | 1,604.54 |
| | 6,525.01 | 10,973.72 |

| | |
|--------------------------|------------------|
| Total differences | 17,498.72 |
|--------------------------|------------------|

CALCULATION OF MAINTENANCE FEES ON FL INTRASTATE CALLS

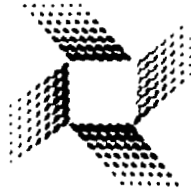
| <u>Months</u> | <u>Intrastate Calls</u> | <u>Months</u> | <u>Total Calls</u> |
|---------------|-------------------------|---------------|--------------------|
| 199901 | - | 199901 | 1,148 |
| 199902 | - | 199902 | 16,992 |
| 199903 | - | 199903 | 85,538 |
| 199904 | - | 199904 | 186,786 |
| 199905 | - | 199905 | 212,646 |
| 199906 | - | 199906 | 109,319 |
| 199907 | - | 199907 | 132,050 |
| 199908 | - | 199908 | 187,061 |
| 199909 | 3,047 | 199909 | 185,048 |
| 199910 | 4,569 | 199910 | 222,309 |
| 199911 | 4,879 | 199911 | 257,683 |
| 199912 | 6,307 | 199912 | 336,531 |
| 200001 | 9,491 | 200001 | 393,313 |
| 200002 | 10,768 | 200002 | 555,029 |
| 200003 | 13,323 | 200003 | 828,912 |
| 200004 | 12,780 | 200004 | 1,028,281 |
| 200005 | 14,501 | 200005 | 1,276,369 |
| 200006 | 19,378 | 200006 | 1,629,499 |
| 200007 | 24,971 | 200007 | 2,091,422 |
| 200008 | 28,485 | 200008 | 2,598,259 |
| 200009 | 29,532 | 200009 | 2,805,511 |
| 200010 | 29,455 | 200010 | 3,121,319 |
| | 211,486 | | 18,261,025 |

Ratio of FL IntraState Calls to Total Calls **1.1581%**

Total Maintenance Fees Charged as of 10/31/00 **\$ 1,328,771.00**

| | |
|--|---------------------|
| Maintenance Fees Attributed to IntraState Calls | \$ 15,388.87 |
|--|---------------------|

ORIGINAL



RADIANT

2001 APR 18 AM 10:26
OFFICE OF
CONSUMER SERVICES

April 10, 2001

Melinda Watts
State of Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0850

Re: Settlement on proposal for Docket Number 001329-TI

Dear Ms. Watts:

In regards to settle Docket No. 001329-TI, Radiant Telecom, Inc. proposes the following to the Florida Public Service Commission:

- 1) Radiant has revised its point of sale displays to conform to Rule 25-24.920, Florida Administrative Code (F.A.C.) and Standards for Prepaid Calling Services and Consumer Disclosure. Radiant will submit the revised displays to Florida Public Service Commission (FPSC) staff for examination.

- We've deleted the statement "that rates are subject to change."

- 2) Radiant agrees to refund, with interest, all overcharges on prepaid calling cards sold in Florida. Overcharges will be calculated for all cards.

The following breakdown is as follows:

| | |
|-------------------|------------------|
| Total interest: | \$ 2,492.27 |
| Total overcharge: | <u>32,887.61</u> |
| Total Refund: | 35,379.88 |

- 3) Radiant has completed all Regulatory Assessment forms for all years and has paid all interest and penalties. (Copy of check included)

AFP _____
 CAF _____
 CMP _____
 COM _____
 CTR _____
 ECR _____
 LEG
 OPC _____
 PAI _____
 RGC _____
 SEC
 SER _____
 TTH _____

DOCUMENT NUMBER - DATE
 05153 APR 25 0
 REGISTRY REPORTING

- 4) Pursuant to Rules 25.24.4890(2)(a) and (b), F.A.C. Records and Reports; Rules incorporated. Radiant will provide the PSC with any changes in required file information and keep it updated in accordance with the rule.

- 5) Radiant has updated its tariff to include prepaid calling services.. The updated tariff accurately reflects the maximum charges for each card and otherwise conforms to Commission rules. Mr. Jeff Bates has the updated tariff

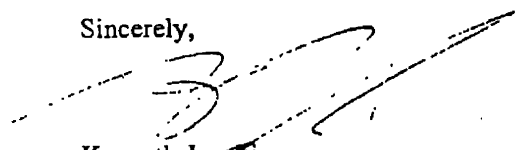
- 6) Pursuant to Rule 25-24.043, F.A.C., Response to Commission Staff Inquiries. Radiant agrees to timely respond to inquiries from FPSC staff.
 - Radiant has set up a procedure for handling all customer complaints and inquiries.

- 7) Radiant has provided FPSC staff with a list of names and addresses where its prepaid phone calling cards are sold in Florida
 - Radiant will keep the Florida Public Service Commission up to date.

- 8) Radiant agrees to make a voluntary contribution of \$7,500 to be made payable to the Florida Public Service Commission.
 - We hereby offer \$7,500 to settle Docket # 001329-TI and hereby waive our objection to the administrative cancellation of our certificate In the event our offer is accepted and we fail to comply with the terms in which we have offered.

Should you have any questions or concerns, please feel free to contact me at: 305-914-3364.

Sincerely,



Kenneth Jacobi
Vice President Regulatory Affairs

TO AVOID PENALTY AND INTEREST FEES, THE REGULATORY ASSESSMENT FEE RETURN MUST BE FILED ON OR BEFORE 01/31/2000

Interexchange Company Regulatory Assessment Fee Return

Florida Public Service Commission
(See Filing Instructions on Back of Form)

| FOR PSC USE ONLY | |
|----------------------------|---------|
| Check/ | |
| \$ _____ | 0603001 |
| \$ _____ | 003001 |
| \$ _____ | P |
| \$ _____ | 0603001 |
| \$ _____ | 004011 |
| Postmark Date _____ | |
| Initials of Preparer _____ | |

STATUS:

- _____ Actual Return
- _____ Estimated Return
- X Amended Return

TJ230
Radiant Telecom, Inc.
6300 N.E. 1st Avenue, Suite 300
Ft. Lauderdale, FL 33334-1901

PERIOD COVERED:
01/01/1999 TO
12/31/1999

Please Complete Below If Official Mailing Address Has Changed

1020 NW 163rd Dr.
(Address)

MIAMI 33169
(City/State) (Zip)

(Name of Company)

| LINE NO. | ACCOUNT CLASSIFICATION | FLORIDA GROSS OPERATING REVENUE | INTRASTATE REVENUE |
|----------|--|---------------------------------|--------------------|
| 1. | Long Distance Services | \$ _____ | \$ _____ |
| 2. | Access Services | \$ _____ | \$ _____ |
| 3. | Private Line Services | \$ _____ | \$ _____ |
| 4. | Leased Facilities & Circuits | \$ 4,172,423.55 | \$ _____ |
| 5. | Miscellaneous Services | \$ _____ | \$ _____ |
| 6. | TOTAL Telephone Services | \$ 4,172,423.55 | \$ _____ |
| 7. | LESS: Amounts Paid to Other Telecommunications Companies* (see "2. Fees" on back) | \$ _____ | \$ _____ |
| 8. | TOTAL REVENUES (Multiply Line 8 by 0.0015) | \$ _____ | \$ _____ |
| 9. | Regulatory Assessment Fee Due (Multiply Line 8 by 0.0015) | \$ _____ | \$ _____ |
| 10. | Penalty for Late Payment (see "5. Failure to File by Due Date" on back) | \$ _____ | \$ _____ |
| 11. | Interest for Late Payment (see "5. Failure to File by Due Date" on back) | \$ _____ | \$ _____ |
| 12. | TOTAL AMOUNT DUE | \$ _____ | \$ _____ |

* These amounts must be intrastate and must be verifiable.

AS PROVIDED IN SECTION 364.336, FLORIDA STATUTES, THE MINIMUM ANNUAL FEE IS \$50

CURRENT COMPANY STATUS

- () Facilities-Based Carrier
- () Alternate-Operator Service
- () Call Aggregator
- () Other: _____

BILLING INFORMATION

Complete below if billing agent if other than _____

(Name) _____ (Address: City/State/Zip) _____ (Telephone) _____
What is the total amount of customer deposits held? Amount \$ _____ for 19____
What is the total amount of bond held (if applicable)? Amount \$ _____ Expires: _____

COMPANY INFORMATION

Do you lease telecommunications facilities? NO
If YES, who do you lease these facilities from? _____
Address: _____

I, the undersigned owner/officer of the _____ company, have read the foregoing and declare that to the best of my knowledge and belief the above information is a true and correct statement. I understand that pursuant to Section 837.06, Florida Statutes, whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his/her duty shall be guilty of a misdemeanor of the second degree.

(Signature of Company Official)
Kenneth Jacobl
(Preparer of Form - Please Print Name)

Vice President - Reg. Affairs 9/2/00
(Title) (Date)
Telephone Number 305 914 3364 Fax Number 305 94 3412
F.E.I. No. 105-0798535

RADIANT TELECOM, INC.

3412

| REFERENCE NO. | DESCRIPTION | INVOICE DATE | INVOICE AMOUNT | DISCOUNT TAKEN | AMOUNT PAID |
|---------------|-------------|--------------|----------------|----------------|-------------|
| 9210 | | 9/21/00 | 6,258.64 | | 6,258.64 |

| CHECK DATE | CHECK NO. | PAYEE | DISCOUNTS TAKEN | CHECK AMOUNT |
|------------|-----------|--------------------------------|-----------------|--------------|
| 9/21/00 | 3412 | Florida Public Serv Commission | | \$6,258.64 |

RADIANT TELECOM, INC.
 1020 NW 163 DRIVE
 MIAMI, FL 33189

FIRST UNION NATIONAL BANK
 83-643-870

CHECK NO. 3412 DATE September 21, 2000 AMOUNT *****\$6,258.64

PAY TO THE ORDER OF: Six Thousand Two Hundred Fifty-Eight and 64/100 Dollars
 Florida Public Serv Commission
 2540 Shumard Oak Blvd.
 Tallahassee, FL 32399-0850

[Signature]

119.07(1)(z), Florida Statutes. Bank account numbers or debit, charge, or credit card numbers given to an agency for the purpose of payment of any fee or debt owing are confidential and exempt from subsection (1) and s.24(a), Art. I of the State Constitution . .