



# 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 - FPSC  
MARCH 16 PM 1:07  
RECORDS AND REPORTING  
AK

**DATE:** MARCH 16, 2000

**TO:** DIVISION OF LEGAL SERVICES (VACCARO, CLEMONS, STERN, CALDWELL) *out*  
DIVISION OF COMMUNICATIONS (M. WATTS) *RTT*

**RE:** INITIATION OF SHOW CAUSE PROCEEDINGS BY FLORIDA PUBLIC SERVICE COMMISSION FOR APPARENT VIOLATION OF SECTION 364.183(1), F.S., ACCESS TO COMPANY RECORDS.

- DOCKET NO. 000222-TX - MOMENTUM TELECOM, INC.
- DOCKET NO. 000223-TX - MAT-TELL COMMUNICATIONS, INC.
- DOCKET NO. 000227-TX - INTERNETU, INC.
- DOCKET NO. 000228-TX - INTER-TEL NETSOLUTIONS, INC.
- DOCKET NO. 000229-TX - BURNO, INC. D/B/A INTEGRA PAGING
- DOCKET NO. 000230-TX - ONYX DISTRIBUTING COMPANY, INC. D/B/A FLORIDA COMM SOUTH
- DOCKET NO. 000231-TX - ERNEST COMMUNICATIONS, INC.
- DOCKET NO. 000232-TX - DATACOMM INTERNATIONAL COMPANY, LTD.

**AGENDA:** 03/28/00 - REGULAR AGENDA - SHOW CAUSE - INTERESTED PERSONS MAY PARTICIPATE

**CRITICAL DATES:** NONE

**SPECIAL INSTRUCTIONS:** KEEP WITH DOCKETS 000074-TX, 000214-TX AND 000233-TX ON AGENDA

**FILE NAME AND LOCATION:** S:\PSC\CMU\WP\000222.RCM

DOCUMENT NUMBER-DATE  
03377 MAR 16 8  
FPSC-RECORDS/REPORTING

DOCKET NOS. 000222-TX, 000223-TX, 000227-TX, 000228-TX, 000229-TX, 000230-TX, 000231-TX, 000232-TX  
DATE: March 16, 2000

**CASE BACKGROUND**

- June 25, 1999 - Each of the certificated Alternative Local Exchange Company (ALEC) providers listed on page 7 were mailed a certified letter (Attachment A, pages 8-12) requesting information necessary for inclusion in the local competition report required of the Commission by Section 364.386, Florida Statutes.
- Mid-July, 1999 - The return receipts (Attachment B, pages 13-16) from the June 25, 1999, certified letters referenced above were received at the Commission for each of the companies listed on page 7.
- December 6, 1999 - Staff sent a second certified letter requesting each of the companies listed on page 7 to respond to the data request no later than December 22, 1999.
- None of the companies listed on page 7 has responded to Commission staff to date.

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DATE: March 16, 2000

### DISCUSSION OF ISSUES

**ISSUE 1:** Should the Commission order each of the companies listed on page 7 to show cause why it should not be fined \$10,000 or its respective certificate, as listed on page 7, should not be canceled for failure to provide the Commission access to information in accordance with Section 364.183(1), Florida Statutes, Access to Company Records?

**RECOMMENDATION:** Yes. The Commission should order each of the companies listed on page 7 to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$10,000 or have its respective certificate, as listed on page 7, canceled for failure to provide the Commission access to information in accordance with Section 364.183(1), Florida Statutes, Access to Company Records. Each company's response should contain specific allegations of fact and law. If any of the companies listed on page 7 fails to respond to the show cause order or request a hearing pursuant to Section 120.57, Florida Statutes within the 21-day response period and the fine is not paid within ten business days after the 21-day response period, the facts should be deemed admitted and the right to a hearing should be deemed waived and the company's respective certificate, as listed on page 7, should be canceled. If the fine is paid, it should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes. **(M. Watts)**

**STAFF ANALYSIS:** Section 364.183(1), Florida Statutes, Access to Company Records states in part:

364.183, Access to Company Records. -

(1) The commission shall have access to all records of a telecommunications company that are reasonably necessary for the disposition of matters within the commission's jurisdiction. The commission shall also have access to those records of a local exchange telecommunications company's affiliated companies, including its parent company, that are reasonably necessary for the disposition of any matter concerning an affiliated transaction or a claim of anticompetitive behavior including claims of cross-subsidization and predatory pricing. The commission may require a telecommunications company to file records, reports or other data directly related to matters within the commission's jurisdiction in the form specified by the commission and may require

such company to retain such information for a designated period of time.

Based on the return receipts (Attachment B, pages 13-16) staff received from the initial data request, it appears that the companies listed on page 7 received the data request and could have responded. It is imperative that the Commission receive 100% participation to accurately reflect the status of local telecommunication competition to the Legislature and the Governor. Staff requested the information in order to comply with Section 364.386, Florida Statutes, Reports to the Legislature. Section 364.386, Florida Statutes, Reports to the Legislature, states in part:

364.386 Reports to the Legislature.-

(1) The commission shall submit to the President of the Senate, the Speaker of the House of Representatives, and the majority and minority leaders of the Senate and the House of Representatives, on December 1, 1996, and on an annual basis thereafter, a report on the status of competition in the telecommunications industry and a detailed exposition of the following:

(a) The overall impact of local exchange telecommunications competition on the continued availability of universal service.

(b) The ability of competitive providers to make functionally equivalent local exchange services available to both residential and business customers at competitive rates, terms, and conditions.

(c) The ability of consumers to obtain functionally equivalent services at comparable rates, terms, and conditions.

(d) The overall impact of price regulation on the maintenance of reasonably affordable and reliable high-quality telecommunications services.

(e) What additional services, if any, should be included in the definition of basic local telecommunications services, taking into account advances in technology and market demand.

(f) Any other information and recommendations which may be in the public interest.

By Section 364.285, Florida Statutes, the Commission is authorized to impose upon any entity subject to its jurisdiction a penalty of not more than \$25,000 for each offense, if such entity is found to have refused to comply with or to have willfully violated any lawful rule or order of the Commission, or any provision of Chapter 364. Utilities are charged with knowledge of the Commission's rules and statutes. Additionally, "[i]t is a

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common maxim, familiar to all minds, that 'ignorance of the law' will not excuse any person, either civilly or criminally." Barlow v. United States, 32 U.S. 404, 411 (1833).

Staff believes that the conduct of each of the companies listed on page 7, by refusing to allow staff access to company records, in apparent violation of Section 364.183(1), Florida Statutes, has been "willful" in the sense intended by Section 364.285, Florida Statutes. In Order No. 24306, issued April 1, 1991, in Docket No. 890216-TL, In re: Investigation Into The Proper Application of Rule 25-14.003, F.A.C., Relating To Tax Savings Refund for 1988 and 1989 for GTE Florida, Inc., having found that the company had not intended to violate the rule, the Commission nevertheless found it appropriate to order it to show cause why it should not be fined, stating that "In our view, willful implies intent to do an act, and this is distinct from intent to violate a rule." Thus, any intentional act, such as the conduct of the companies listed on page 7 at issue here, would meet the standard for a "willful violation."

The companies listed on page 7 did not respond to the Commission's first or second request for the above information. Therefore, staff recommends that the Commission order each of the companies listed on page 7 to show cause in writing within 21 days of the issuance of the Commission's Order why it should not be fined \$10,000 or have its respective certificate, as listed on page 7, canceled for failure to provide the Commission access to information in accordance with Section 364.183(1), Florida Statutes, Access to Company Records. Each company's response should contain specific allegations of fact and law. If any of the companies listed on page 7 fails to respond to the show cause order or request a hearing pursuant to Section 120.57, Florida Statutes within the 21-day response period and the fine is not paid within ten business days after the 21-day response period, the facts should be deemed admitted and the right to a hearing should be deemed waived and the company's respective certificate, as listed on page 7, should be canceled. If the fine is paid, it should be remitted by the Commission to the State of Florida General Revenue Fund pursuant to Section 364.285, Florida Statutes.

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**ISSUE 2:** Should these dockets be closed?

**RECOMMENDATION:** No. If staff's recommendation in Issue 1 is approved, they will remain open pending the outcome of the show cause proceedings. If each of the companies listed on page 7 timely responds to its respective show cause orders, its respective docket should remain open pending resolution of the show cause proceedings.

Staff recommends that if any of the companies listed on page 7 fails to respond to the Order to Show Cause within the 21-day show cause response period and the respective fine is not received within ten business days after the expiration of the show cause response period, the company's respective certificate, as listed on page 7, should be canceled and its respective docket may be closed administratively. If each of the companies listed on page 7 pays the fine recommended in Issue 1, the company's respective docket should be closed. A protest in one docket should not prevent the action in a separate docket from becoming final. **(Keating)**

**STAFF ANALYSIS:** If staff's recommendations in Issue 1 is approved, they will remain open pending the outcome of the show cause proceedings. If each of the companies listed on page 7 timely responds to its respective show cause orders, its respective docket should remain open pending resolution of the show cause proceedings.

Staff recommends that if any of the companies listed on page 7 fails to respond to the Order to Show Cause within the 21-day show cause response period and the respective fine is not received within ten business days after the expiration of the show cause response period, the company's respective certificate, as listed on page 7, should be canceled and its respective docket may be closed administratively. If each of the companies listed on page 7 pays the fine recommended in Issue 1, the company's respective docket should be closed. A protest in one docket should not prevent the action in a separate docket from becoming final.

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DOCKET NO.	PROVIDER	REPORTED REVENUES 1999	CERT NO.
000222-TX	Momentum Telecom, Inc.	99: Not reported 98: \$0	5654
000223-TX	Mat-Tell Communications, Inc.	99: Not reported 98: \$0	4759
000227-TX	InternetU, Inc.	99: Not reported 98: Not reported	5678
000228-TX	Inter-Tel NetSolutions, Inc.	\$0	5285
000229-TX	Burno Inc. d/b/a Integra Paging	99: Not reported 98: \$17,120.08	5334
000230-TX	Onyx Distributing Co. Inc. d/b/a Florida Comm South	99: Not reported 98: \$3,371,976.46	4757
000231-TX	Ernest Communications, Inc.	99: Not reported 98: \$0	5722
000232-TX	Datacomm International Company, Ltd.	99: Not reported 98: \$0	4711

DOCKET NOS. 000222-TX, 000223-TX, 000227-TX,  
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000232-TX

ATTACHMENT A

*ALEC*

DATE: March 16, 2000

STATE OF FLORIDA

Commissioners:  
JOE GARCIA, CHAIRMAN  
J. TERRY DEASON  
SUSAN F. CLARK  
JULIA L. JOHNSON  
E. LEON JACOBS, JR.



DIVISION OF  
TELECOMMUNICATIONS  
WALTER D'HAESELEER  
DIRECTOR  
(850) 413-6600

## Public Service Commission

June 25, 1999

Name  
Company Name  
Address 1  
Address 2  
City, State, Zip Code

via certified mail

Dear:

Chapter 364, Florida Statutes, contains the framework the Commission uses for regulation of the telecommunications industry. As a result of certain amendments made to this chapter during the 1995 Legislative session, the Commission has a statutory mandate to prepare and deliver annually a report, to the Governor and the Legislature, on the status of competition in the telecommunications industry. The report is due December 1.

In order to meet this Legislative mandate we must gather data from the industry. The attached data request will help us evaluate the status of local competition in Florida. The survey was designed to enable fairly brief responses. In addition, we ask that you provide any comments or additional information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida.

Once the completed data request is received by the commission, the information will become public record. If you believe your response to the data request contains confidential information, you can request that your response be exempt from F.S. 119.07(1), General State Policy on Public Records. Enclosed is Florida Public Service Commission Rule 25-22.006, Florida Administration Code, which provides the necessary information for submitting confidential information to be exempt from F.S. 119.07(1).

In order to meet our statutory obligations, it is essential that we obtain this information in a timely manner. Florida Public Service Commission Rule 25-4.043, Florida Administration Code, Response to Commission Staff inquiries, states:

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

An Affirmative Action/Equal Opportunity Employer

PSC Website: [www.scri.net/psc](http://www.scri.net/psc)

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)



DOCKET NOS. 000222-TX, 000223-TX, 000227-TX,  
000228-TX, 000229-TX, 000230-TX, 000231-TX,  
000232-TX

ATTACHMENT A

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Page 2

January 29, 1999

The necessary replies to inquiries propounded by the Commission's staff concerning service or other complaints received by the Commission shall be furnished in **writing within fifteen (15) days** from the date of the Commission inquiry.

Failure to comply with Rule 25-4.043, Florida Administration Code, can result in the Commission assessing penalties of up to \$25,000 per offense, where each day of non-compliance constitutes separate offences per F.S. 364.285(1).

We ask that you provide your responses to the enclosed data requests no later than August 6, 1999. Your response may be sent via mail, or by facsimile to (850) 413-6549. If there are any questions, please call David Wolfe at (850) 413-6548.

Sincerely,

Walter D'Haeseleer  
Director  
Division of Communications

Enclosures:  
g:\cmprpt99\

**1999 ALEC Data Request**

Florida Statute 364.02(2) defines basic local service as:

**"Basic local telecommunications service" means voice-grade, flat-rate residential and flat-rate single line business local exchange services which provide dial tone, local usage necessary to place unlimited calls within a local exchange area, dual tone multi-frequency dialing, and access to the following: emergency services such as "911," all locally available interexchange companies, directory assistance, operator services, relay services, and an alphabetical directory listing. For a local exchange company, such terms shall include any extended area service routes, and extended calling service in existence or ordered by the commission on or before July, 1 1995.**

1.
  - a. Are you providing service to residential customers in Florida that complies with the above definition of **basic local service**?
  - b. To how many residential customers are you providing **basic local service** in Florida?
  - c. What are your current rates for providing residential **basic local service**?
  - d. Are you providing service to business customers in Florida that complies with the above definition of **basic local service**?
  - e. To how many business customers are you providing **basic local service** in Florida?
  - f. What are your current rates for providing business **basic local service** in Florida?
  
2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of **basic local service** ? (Examples could include: multiline business users; services with toll restrictions or usage; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offerings; etc.)  
(If yes, continue with question #2; if no, skip to Question #3)
  - a. Are you currently providing other forms of local service to residential customers in Florida?
  - b. If the response to a. is affirmative, please describe the forms of local service you are providing to residential customers in Florida. (If available, please provide brochures or comparable materials.)
  - c. If the response to a. is affirmative, please indicate your current rates for the services indicated in response to b.
  - d. Are you currently providing other forms of local service to business customers in Florida?
  - e. If the response to d. is affirmative, please describe the forms of local service you are providing to business customers in Florida. (If available, please provide brochures or comparable materials.)
  - f. If the response to d. is affirmative, please indicate your current standard rates for the services indicated in response to e.

DATE: March 16, 2000

3.
  - a. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.).
  - b. For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchanges is attached), the number of residential access lines served. (See example below)
  - c. For each exchange where you are providing any form of business local telephone services, please identify by exchange (a list of exchanges is attached), the number of business access lines served. (See example below)

*Examples*

<i>Miami Exchange:</i>	<i>Residential Access Lines - 154</i>	<i>Business Access Lines - 255</i>
<i>Yulee Exchange:</i>	<i>Residential Access Lines - 161</i>	<i>Business Access Lines - 202</i>

- d. For billing and accounting purposes, do you differentiate between residential and business customers?
  - e. Are you currently offering any enhanced services? If yes, what are they?
  - f. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.
  - g. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.
  - h. Do you anticipate that your long-term manner of providing service will differ from your current practice? If so, do you expect becoming a full scale facilities-based provider?
  - i. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned and for each code, as of June 30, 1999, how many numbers have been assigned from the code?
4. If you are not currently providing local telephone service in Florida:
    - a. Please explain why you are not providing local telephone service. For example, have you experienced marketing or billing difficulties? Lack of capital? Customers are not willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the LECs? Insufficient profit margin?
    - b. Do you anticipate providing local telephone service at some future date? If yes, please indicate when. (e.g., first quarter 2000)
    - c. Please describe the most important factors that you believe are inhibiting your ability to provide local telephone service, and describe how these factors have adversely affected your entry.
    - d. Are you currently providing any other telecommunications services in Florida (i.e., other than local service)? If yes, please list the services provided.

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5. Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange service, local service, cellular service, paging service, electric service, municipality, etc.).
6. At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn the service? If yes, please discuss the reasons for this decision.
7. If you or an affiliate provides cable television in Florida, do you offer any package plans combining cable television and local telephone services? If so, please indicate where such packages are being offered.
8. If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans and their terms and conditions. Is subscribing to both local telephone and long distance a condition of providing service?
9. If you or an affiliate's primary business is unrelated to the provision of telecommunications, please indicate the nature of such primary business(es). Examples of such businesses could include, but are not limited to: pawn shops, title loan companies, alternative automobile financing, internet service providers, or check cashing services.
10.
  - a. Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.
  - b. Please describe any actions which you may believe should be taken by the Florida legislature that would foster local exchange competitive market entry.
11. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.
12. Please provide a copy of your (or your parent company's) most recent annual report to shareholders and Form 10-K.
13.
  - a. Please indicate your gross Florida intrastate operating revenues for the year ending 12/31/98. If available, please separate between residential and business.
  - b. Please indicate your company's 1998 assessable revenues, as reported for Florida revenue assessment fees.

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Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Kyra Bush Sarem  
Attorney  
Momentum Telecom, Inc.  
3100 Kerner Blvd., Suite C  
San Rafael, CA 94901

I also wish to receive the following services (for an extra fee):

1.  Addressee's Address  
2.  Restricted Delivery  
Consult postmaster for fee.

4a. Article Number

4b. Service Type

Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery 7/6/99

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

9. Signature: (Addressee or Agent)  
*[Signature]*

PS Form 3811, December 1994 102595-98-8-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Michael DiVeronica, Jr  
President  
Mat-Tel Communications, Inc.  
2301 Collins Avenue, #M-24  
Miami Beach, FL 33139-1638

I also wish to receive the following services (for an extra fee):

1.  Addressee's Address  
2.  Restricted Delivery  
Consult postmaster for fee.

4a. Article Number

4b. Service Type

Registered  Certified  
 Express Mail  Insured  
 Return Receipt for Merchandise  COD

7. Date of Delivery 7-15-99

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

9. Signature: (Addressee or Agent)  
*[Signature]*

PS Form 3811, December 1994 102595-98-8-0229 Domestic Return Receipt

Thank you for using Return Receipt Service.

DATE: March 16, 2000

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee):  1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Rita M. Meltzer Controller InternetU, Inc. % Florida Online 1129 South U.S. Highway 1 Rockledge, FL 32955-2713		4a. Article Number	
			4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
			7. Date of Delivery 7-6-99	
5. Received By: (Print Name)		8. Addressee's Address (Only if requested and fee is paid)		
6. Signature: (Addressee or Agent) <i>Susan J. Meltzer</i>				
PS Form 3811, December 1994		102595-99-9-0229 Domestic Return Receipt		

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee):  1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	3. Lonnie J. Barrett Corporate Paralegal Inter-Tel NetSolutions, Inc. 120 North 44th Street, Suite 300 Phoenix, AZ 85034		4a. Article Number	
			4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
			7. Date of Delivery 7-8-99	
5. Received By: (Print Name) W.S.		8. Addressee's Address (Only if requested and fee is paid)		
6. Signature: (Addressee or Agent) <i>Jackie Meeks</i>				
PS Form 3811, December 1994		102595-99-9-0229 Domestic Return Receipt		

Thank you for using Return Receipt Service.

DATE: March 16, 2000

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	Donald T. Bumo President Integra Paging 4220 West Colonial Drive Orlando, FL 32808-8135		4a. Article Number	
			4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
			7. Date of Delivery	
	5. Received By: (Print Name)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature: (Addressee or Agent)				
PS Form 3811, December 1994		102595-98-8-0229 Domestic Return Receipt		

Thank you for using Return Receipt Service.

Is your RETURN ADDRESS completed on the reverse side?	<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
	Marty Oakes Director, Regulatory Affairs Florida Comm South 6830 Walkway Lane Dallas, TX 75231		Article Number	
			4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
			7. Date of Delivery 7-6-99	
	5. Received By: (Print Name)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature: (Addressee or Agent)				
PS Form 3811, December 1994		102595-98-8-0229 Domestic Return Receipt		

Thank you for using Return Receipt Service.

DATE: March 16, 2000

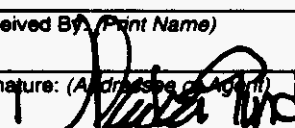
Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input checked="" type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
Paul Masters Vice President Ernest Communications, Inc. 6475 Jimmy Carter Blvd., Suite 300 Norcross, GA 30071		4a. Article Number <hr/> 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name) <hr/> 6.		7. Date of Delivery 03 19	
PS		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

Receipt

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
Anthony Harper President Datacomm International Company, Ltd. 2 South Biscayne Blvd., Suite 2670 Miami, FL 33131-1804		4a. Article Number <hr/> 4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD	
5. Received By: (Print Name)		7. Date of Delivery 06 JUL 1999	
6. Signature: (Addressee or Agent) X 		8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-98-8-0229

Domestic Return Receipt