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April 9, 2002

BY OVERNIGHT MAIL

Blanca S. Bayó
Commission Clerk and Administrator Services Director
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

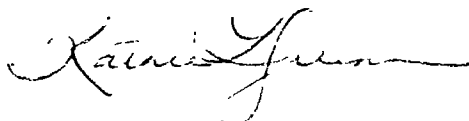
Re: Application of Network Plus, Inc. d/b/a Hale and Father, Inc. for Authority to Discontinue Telecommunications Services, to Surrender its Certificates to Provide Telecommunications Services and to Cancel its Tariffs in the State of Florida

Dear Ms. Bayó:

On behalf of Network Plus, Inc. d/b/a Hale and Father, Inc. ("Network Plus"), enclosed please find an original and fifteen (15) copies of the above-referenced Application. Network Plus requests expedited processing of this Application so that it may discontinue services to customers on **May 10, 2002**, the date upon which BellSouth intends to discontinue underlying telecommunications services.

Please date-stamp and return the extra copy of this filing in the postage prepaid envelope provided. Please do not hesitate to contact us if you have any questions regarding this Application.

Respectfully submitted,



Kathleen L. Greenan

Counsel for Network Plus, Inc. d/b/a Hale
and Father, Inc.

Enclosure

cc: Lisa Butler, Network Plus

400889v1

DOCUMENT NUMBER-DATE

03979 APR 10 2002

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

_____)	
Application of)	
)	
Network Plus, Inc.)	Docket No. _____
d/b/a Hale and Father, Inc.)	
)	
For Authority to Discontinue)	
Telecommunications Services in the)	
State of Florida, to Surrender its)	
Certificate to Provide)	
Telecommunications Services)	
and to Cancel its Tariffs)	
_____)	

APPLICATION

Network Plus, Inc. d/b/a Hale and Father, Inc. (“Network Plus” or “Applicant”), pursuant to Fla. Admin Code §§ 25-24.474, -24.820, respectfully requests Commission authority to discontinue telecommunications services in the State of Florida, to surrender its certificates to provide telecommunications services in Florida and to cancel all applicable tariffs in Florida. Recent events, which are described below, have caused the commencement of procedures by BellSouth Telecommunications, Inc. (“BellSouth”) to terminate underlying telecommunications services that are essential to Network Plus’ ability to provide local and long distance service to customers in Florida. Pursuant to BellSouth’s notice, such services will be disconnected on May 10, 2002. Therefore, Network Plus requests expedited processing of this Application so that it may discontinue service on May 10, 2002. In support of this Application, Network Plus provides the following information:

I. BACKGROUND

Network Plus provides local exchange and interexchange telecommunications services in Florida pursuant to Certificates granted by this Commission in Docket No. 980909-TX , Order No. PSC-98-1357-FOF-TX (Oct. 12, 1998) (ALEC Certificate No. 5711) and Docket No. 920030-TI, Order No. PSC-92-0698-FOF-TI (IXC Certificate No. 2994).

Network Plus notified the Commission by letter dated February 6, 2002 that the Company filed for bankruptcy protection under Chapter 11 of the United States Bankruptcy Code. On March 5, 2002, the United States Bankruptcy Court for the District of Delaware (“Bankruptcy Court”) approved a Stipulation and Order Granting Adequate Assurance to Certain Utilities (“Stipulation”). The Stipulation provides, in part, that failure to make payment to any utility listed in the Stipulation enables such utility to disconnect service to Network Plus upon 24-hours facsimile notice in accordance with contracts, unless local telephone service is being disconnected, which requires at least 35 calendar days notice. On April 1, 2002, BellSouth did not receive payment in accordance with the Stipulation, nor was such failure to pay cured within three business days as provided for in the Bankruptcy Court Order approving the sale of Network Plus to Broadview NP Acquisition Corp. (the “Sale Order”).¹ On April 6, 2002, BellSouth notified Network Plus that, pursuant to the Stipulation, it will disconnect services to Network Plus on May 10, 2002. The services provided by BellSouth to Network Plus are essential in the provision of service to Network Plus customers in Florida and, as a result, Network Plus cannot continue to provide service in Florida following disconnection by BellSouth.

¹ See Order Authorizing (i) Sale of Certain of the Debtors’ Assets Free and Clear of Liens, Claims Encumbrances, and Other Interests, (ii) Authorizing the Assumption and Assignment of Executory Contracts and Leases, (iii) Authorizing the Debtors to Enter into and Approving Management Agreement, (iv) Approving Regulatory Transition Process, (v) Determining that such

Due to the serious nature of the disconnection of service to customers, Network Plus promptly notified all of its existing customers of the anticipated disconnection and immediately proceeded to file this Application. A copy of the discontinuance notice sent to customers is attached hereto as Exhibit A. Applicant requests that the Commission grant this Application expeditiously to permit discontinuance in accordance with the notice received from BellSouth pursuant to the Stipulation.

II. CONTACTS

Correspondence or communications pertaining to this Application should be directed to:

Jean L. Kiddoo
Kathleen L. Greenan
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, DC 20007
(202) 424-7834 (phone)
(202) 424-7645 (fax)

with a copy to:

Lisa Butler
Network Plus, Inc.
41 Pacella Park Drive
Randolph, Massachusetts 02368
(781) 473-2977 (phone)
(781) 786-4047 (fax)

III. DESCRIPTION OF DISCONTINUANCE

A. Name and Address of Carriers

Network Plus, Inc.
41 Pacella Park Drive
Randolph, Massachusetts 02368

Sale is Exempt from Stamp, Transfer, Recording or Similar Taxes and (vi) Granting Related Relief, Case no. 02-10341 (PJW) (March 20, 2002) (Bankr. D. Del.).

B. Description of the type of service affected

Network Plus provides local exchange and long distance telecommunications service, international telephone service, and toll free service to business customers located throughout the State. Network Plus plans to discontinue all services provided within the State of Florida.

C. Date of planned service discontinuance

Network Plus plans to discontinue its telecommunications services on May 10, 2002.

D. Points of geographic areas of service affected

Network Plus plans to discontinue all services provided by the Company in all areas of the State. The discontinuance of services described above will affect approximately 13,756 customers in Florida.

E. Description of the dates and methods of notice to all affected customers

Network Plus has provided written customer notice by letter to customers dated April 8, 2002. A copy of Network Plus' customer notice letter is attached as Exhibit A.

F. Regulatory Assessment Fee

As stated earlier, Network Plus is currently in Chapter 11 proceedings. Therefore, Network Plus cannot provide a statement of intent and date certain to pay a regulatory assessment fee as required by the rules.

IV. PUBLIC INTEREST CONSIDERATIONS

Network Plus' disconnection of its customers in Florida, while regrettable, is necessary and appropriate, and will not adversely affect the public convenience and necessity. The public will not be unduly harmed by the discontinuance of the telecommunications service described

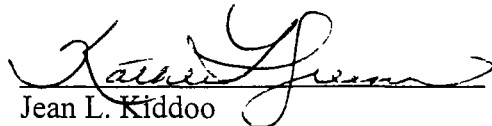
above because customers have been given notice, which affords them an opportunity to transfer to a new carrier.

V. **CONCLUSION**

Network Plus believes that the proposed discontinuance, the voluntary surrender of its Certificates to provide telecommunications services in Florida and the cancellation of its applicable tariffs are reasonable and necessary and not unduly disruptive to the present or future public convenience and necessity.

Respectfully submitted,

By:



Jean L. Kiddoo
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Washington, DC 20007
(202) 424-7834 (Tel)
(202) 424-7645 (Fax)

Counsel for Network Plus, Inc. d/b/a Hale
and Father, Inc.

Dated: April 9, 2002

EXHIBIT A
CUSTOMER NOTICE LETTER



April 8, 2002

Re: **DISCONTINUANCE OF SERVICE in Florida, Georgia and North Carolina – YOUR IMMEDIATE ACTION IS REQUIRED**
PLEASE DO NOT DISREGARD THIS NOTICE

Dear Customer:

We regret to inform you that Network Plus **must discontinue all services you are receiving in Florida, Georgia and North Carolina. as of May 10, 2002.** This discontinuance will affect all local, long distance, toll free and Internet or other data services you are currently receiving from Network Plus in those states. If you receive services at locations outside of these three states, such services will not be affected. We understand that you received a notice dated March 19, 2002, advising you that service would be continued as a result of an investment by Broadview Networks, but subsequent events beyond our control now require us to discontinue all services.

You must select a new service provider IMMEDIATELY in order to assure that you will not lose your telephone service on May 10. It can take several weeks for new service to be installed. Therefore, please do not delay in arranging for a new carrier, and check carefully that all service types you currently have with Network Plus (local, long distance, calling card, toll free and/or data) are moved to your new carrier(s). Please note the following numbers that might be of help as you transition to a new carrier:

BellSouth: Business 800-753-8172
Residential 800-753-8172

Other: A list of other local and long distance carriers serving your area can generally be found in the front of your local telephone book.

The Federal Communications Commission ("FCC") permits customers to object to discontinuance of their service by a telecommunications provider. As provided in the FCC's rule 47 CFR 63.71:


The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments within 15 days after receipt of this notification. Address them to the Federal Communications Commission, Washington, D C 20554, referencing the Section 63.71 Application of Network Plus, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Network Plus appreciates the opportunity we have had to serve you and we sincerely regret the actions that we are forced to undertake at this time. Again we urge you to act **IMMEDIATELY** to obtain service from another carrier. If we can provide assistance in the transition of service to another carrier or you have questions about the discontinuance process, please call our National Customer Satisfaction Center, which can be reached at 800-230-6000.

VERIFICATION

I, Nate Arnett, state that I am Assistant Restructuring Officer of Network Plus, Inc.; that I am authorized to make this Verification on behalf of Network Plus, Inc.; that the foregoing was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of April, 2002.


Name: Nate Arnett
Title: ARO
Network Plus, Inc.