



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-

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AUG - 8 AM 10:24
COMMISSION CLERK

DATE: AUGUST 8, 2002

TO: DIRECTOR, DIVISION OF THE COMMISSION CLERK &
ADMINISTRATIVE SERVICES (BAYÓ)

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (BUYS) *DRB*
OFFICE OF THE GENERAL COUNSEL (L. FORDHAM) *LF*

RE: DOCKET NO. 020666-TI - COMPLIANCE INVESTIGATION OF SKY
TELECOM, INC. FOR APPARENT VIOLATION OF RULE 25-24.910,
F.A.C., CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
REQUIRED.

AGENDA: 08/20/02 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\020666.RCM

CASE BACKGROUND

- December 1, 2001 through March 15, 2001 - Staff investigated several prepaid calling cards sold by Sky Telecom, Inc. (Sky Telecom). As a result of its investigation, staff determined that Sky Telecom is apparently selling prepaid calling services (PPCS) to the Florida public without first obtaining a Certificate of Public Convenience and Necessity (certificate) from the Commission.
- March 21, 2001 - Staff sent a certified letter via U.S. Postal Service to Sky Telecom informing the company that staff believes the telecommunications service provided by Sky Telecom requires a certificate (Attachment A).
- April 4, 2002 - Sky Telecom submitted its reply to staff's letter via facsimile (Attachment B). The company indicated that it has discontinued doing business with the companies

DOCUMENT # 020666-011
08336 AUG-8 2002
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providing the underlying services for the calling cards in staff's investigation but did not address the apparent requirement for a certificate.

- April 26, 2002 - Staff sent a certified letter via U.S. Postal Service to Sky Telecom informing the company that its reply did not address all of the issues in staff's inquiry and reiterated that staff believes that the company is selling prepaid calling services in Florida which requires a certificate (Attachment C).
- April 29, 2002 - Staff received a call from Mr. Tino Patel, CEO of Sky Telecom. Mr. Patel stated that his company would apply for a certificate and requested that staff send him the application form via facsimile. Mr. Patel also stated that Mr. Brian would be handling the application process.
- May 1, 2002 - Staff sent Sky Telecom a facsimile of the application form for an IXC certificate (Attachment D). Mr. Brian subsequently called staff and requested that staff send the application to him via U.S. Mail.
- May 2, 2002 - Staff sent Sky Telecom an IXC certificate application package via U.S. Postal Service certified mail.
- May 8, 2002 - Staff received the U.S. Postal Service "green card" receipt indicating that D. Patel signed for and received the IXC application package on May 6, 2002 (Attachment E).
- June 19, 2002 - Staff sent an email to Mr. Tino Patel at Sky Telecom informing him that, as of June 19, 2002, the company's application has not been received by the Commission (Attachment F).
- July 9, 2002 - Staff opened this docket to address Sky Telecom's apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required.

The Commission is vested with jurisdiction over this matter pursuant to Sections 364.285 and 364.337, Florida Statutes. Further, staff's recommended penalty is consistent with penalties imposed upon other companies by the Commission in previous dockets for the same apparent rule violation. Accordingly, staff believes the following recommendations are appropriate.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission impose a \$25,000 penalty on Sky Telecom, Inc. for apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required?

RECOMMENDATION: Yes. The Commission should impose a \$25,000 penalty on Sky Telecom, Inc. for apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. The penalty should be paid to the Florida Public Service Commission and forwarded to the Office of the Comptroller for deposit in the General Revenue Fund pursuant to Section 364.285(1), Florida Statutes. If the Commission's Order is not protested and the payment of the penalty is not received within fourteen calendar days after the issuance of the Consummating Order, the collection of the penalty should be referred to the Office of the Comptroller. Further, if Sky Telecom, Inc. fails to timely protest the Commission's Order, and fails to obtain an IXC Certificate of Public Convenience and Necessity, the company should be required to immediately cease and desist providing prepaid calling services in Florida upon issuance of the Consummating Order until the company obtains an IXC Certificate of Public Convenience and Necessity. **(Buys, L. Fordham)**

STAFF ANALYSIS: Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, states:

A company shall not provide PPCS without first obtaining a certificate of public convenience and necessity as a local exchange company, alternative local exchange company, or interexchange company. The name used as the provider of PPCS printed on the prepaid calling card shall appear identical to the name in which the certificate is issued. A "doing business as" name may be used in lieu of the certificated name if it is registered as a fictitious name with the Florida Division of Corporations and reflected on the certificate before the name is used on the card.

During the course of its investigation into several prepaid phone cards, staff determined that Sky Telecom is providing prepaid calling services to the public and should have obtained a certificate. Staff learned that Sky Telecom apparently contracts

DATE: August 8, 2002

with underlying carriers to purchase prepaid calling card services in the form of PIN accounts and subsequently encodes those PIN account numbers along with a toll-free access number on its prepaid calling cards and then sells those cards to distributors and end users alike. Staff believes that the company's actions constitute the act of providing (reselling) prepaid calling services to the public and is clearly included in the definition of a "company" pursuant to Rule 25-24.905(1), Florida Administrative Code, Terms and Definitions, which states:

(1) "Company" means any entity providing prepaid calling services to the public using its own or resold telecommunications network.

In addition, it appears that Sky Telecom is selling prepaid calling services to Florida consumers in the form of "virtual" PIN accounts through its website, www.thephonecards.com. A printout of Sky Telecom's virtual PIN webpage is provided in Attachment G. Virtual PIN accounts are merely the PIN numbers that would normally be encoded on the back of a prepaid calling card, but in this case, just the PIN numbers are sold.

Staff sent two certified letters to Mr. Tino Patel, CEO, informing Sky Telecom that staff believes the company requires a certificate. Subsequently, Mr. Tino Patel called staff on April 29, 2002, and confirmed that his company would submit an application for a certificate to the Commission.

Staff sent Sky Telecom two application forms, one via facsimile to Mr. Patel, and one via certified U.S. Mail to Mr. Brian. Staff also sent an email to Mr. Patel on June 19, 2002, informing him that the Commission has not yet received Sky Telecom's application. As of July 29, 2002, Sky Telecom has not submitted an application for a certificate to the Commission, nor has anyone at Sky Telecom contacted staff since May 1, 2002.

Staff believes that Sky Telecom's apparent violation of Rule 25-24.910, Florida Administrative Code, is "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 Sky Telecom's conduct at issue here, would meet the standard for a "willful violation."

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 per day 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 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).

Accordingly, staff recommends that the Commission should impose a \$25,000 penalty on Sky Telecom, Inc. for apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. The penalty should be paid to the Florida Public Service Commission and forwarded to the Office of the Comptroller for deposit in the General Revenue Fund pursuant to Section 364.285(1), Florida Statutes. If the Commission's Order is not protested and the payment of the penalty is not received within fourteen calendar days after the issuance of the Consummating Order, the collection of the penalty should be referred to the Office of the Comptroller. Further, if Sky Telecom, Inc. fails to timely protest the Commission's Order, and fails to obtain an IXC Certificate of Public Convenience and Necessity, the company should be required to immediately cease and desist providing prepaid calling services in Florida upon issuance of the Consummating Order until the company obtains an IXC Certificate of Public Convenience and Necessity.

DOCKET NO. 020666-TI

DATE: August 8, 2002

ISSUE 2: Should this docket be closed?

RECOMMENDATION: The Order issued from this recommendation will become final upon issuance of a Consummating Order, unless a person whose substantial interests are affected by the Commission's decision files a protest within 21 days of the issuance of the Proposed Agency Action Order. This docket should then be closed administratively upon either receipt of the payment of the penalty, or upon referral of the penalty to the Office of the Comptroller for collection if the penalty is not paid within fourteen calendar days after issuance of the Consummating Order. **(L. Fordham)**

STAFF ANALYSIS: The Order issued from this recommendation will become final upon issuance of a Consummating Order, unless a person whose substantial interests are affected by the Commission's decision files a protest within 21 days of the issuance of the Proposed Agency Action Order. This docket should then be closed administratively upon either receipt of the payment of the penalty, or upon referral of the penalty to the Office of the Comptroller for collection if the penalty is not paid within fourteen calendar days after issuance of the Consummating Order.

STATE OF FLORIDA

COMMISSIONERS:
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J. TERRY DEASON
BRAULIO L. BAEZ
MICHAEL A. PALECKI
RUDOLPH "RUDY" BRADLEY



DIVISION OF COMPETITIVE MARKETS &
ENFORCEMENT
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

March 21, 2002

CERTIFIED

Mr. Tino Patel
Sky Telecom, Inc.
10376 E. Colonial Drive
Orlando, FL 32817

Re: Certification Requirement

Dear Mr. Patel:

During the course of our investigation into the *ONE CENT per minute* phone card (Enclosure 1) we were informed by XO Communications (XO) that your company, Sky Telecom, should be certificated with the Commission based on contractual obligations with XO. I am also investigating the *INDIA SKY* phone card (Enclosure 2). AT&T d/b/a SmarTalk informed me that Sky Telecom is the entity providing the *INDIA SKY* prepaid phone card to Florida consumers. I have received copies of letters addressed to you from XO and SmarTalk and enclosed both letters for your review (Enclosures 3 & 4). Both companies have informed us they provide your company with the underlying prepaid calling services (PPCS) and do not print, issue, or distribute the actual phone cards.

Moreover, upon logging on to your internet site, www.thephonecards.com, it appears that Sky Telecom is also selling prepaid calling services to Florida consumers in the form of "virtual" PIN accounts - without an actual phone card. If true, it appears that Sky Telecom is purchasing underlying prepaid calling services from XO and SmarTalk and reselling it to the public. This practice constitutes the act of providing (reselling) prepaid services and is clearly included in the definition of a "company" pursuant to Rule 25-24.905(1), Florida Administrative Code, Terms and Definitions, which states:

- (1) "Company" means any entity providing prepaid calling services to the public using its own or resold telecommunications network.

Mr. Patel, it appears to me that your company is providing prepaid calling services in Florida and requires a Certificate of Public Convenience and Necessity (Certificate). You can obtain an application form and all the pertinent information, including a copy of the Commission's rules, from our website, www.psc.state.fl.us.

Mr. Tino Patel
Page 2
March 21, 2002

As a PPCS provider, Sky Telecom is responsible for ensuring that its prepaid calling services sold to the public comply with all of the Commission's rules governing prepaid calling services. One of the purposes of this letter is to inform your company of several apparent violations of Rule Nos. 25-24.910, 25-24.915, and 25-24.920, Florida Administrative Code, and provide you with an opportunity to correct the problems. The enclosed evaluation form (Enclosure 5) indicates the apparent rule violations associated with the *ONE CENT per minute* phone card and Sky Telecom's services. The checked boxes denote the problems found and the apparent rule infractions.

I would also like to point out that the statement printed on the back of the *ONE CENT per minute* phone card, "20% applicable taxes and operational fees deducted from total minutes," seems vague and does not clearly indicate the actual charges the customer will incur. Preferably, any taxes and operational fees should be included in the per minute rate or disclosed as an additional surcharge of a specific amount.

Furthermore, according to representatives at SmarTalk, your company is also responsible for the printing and resale of the *India Sky* prepaid calling cards in Florida. In the letter from Ms. Virginia Tate (Enclosure 4), she requested that you send her written assurances by March 15, 2002, that your company will immediately adhere to the Florida prepaid card rules. I am very interested in the actions your company is taking to ensure that the *India Sky* prepaid phone card is in compliance with the Commission's rules.

Mr. Patel, please provide me with a copy of the written assurances I presume were sent to Ms. Tate as requested in her letter dated February 6, 2002, by March 29, 2002. You can send me a facsimile. Also, please provide me with a written reply listing the actions your company is taking to correct the apparent rule violations cited in the evaluation form (Enclosure 5), by April 12, 2002. Most importantly, please submit your company's application for a Certificate to the Commission's Division of Commission Clerk and Administrative Services by April 12, 2002. Should you have any questions, please give me a call.

Sincerely,



Dale R. Buys
Regulatory Analyst
Bureau of Service Quality

Voice: 850-413-6536
Facsimile: 850-413-6537
Email: dbuys@psc.state.fl.us

DRB
Enclosures (5)

cc: Jackie Gilchrist
Florida Department of Revenue

DOCKET NO. 020666-TI
DATE: August 8, 2002

Attachment B

FROM : www.thephonecards.com

FAX NO. :

Apr. 04 2002 01:02PM P1

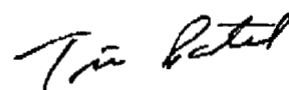
Dear Mr. Dale Buys:

This is to notify that after going through your Certification Requirement, and as per your investigation into ONE CENT per minute phone card (Enclosure), and the INDIA SKY phone card (Enclosure 2) by Smarttalk.

We have taken the following action to correct the apparent rule violations cited in the evaluation form (Enclosure 5).

- 1) We have discontinued our business with XO Communications (XO), and Smarttalk. As the following companies have refused to sell us (SKYTELECOM), the prepaid calling services (PPCS), and the virtual pins. Therefore we cannot print, issue, or distribute the actual cards, and thereby we have recalled all the ONE CENT and INDIA SKY phone cards from the market, and all the phonecards are in our possession. Should you have any questions, please give me a call.

Sincerely,



Tino Patel.
CEO.

Voice: 407 382 7888.(102)
Facsimile: 407 273 9888
Email: Tino@skytelccom.com

STATE OF FLORIDA

COMMISSIONERS:
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J. TERRY DEASON
BRAULIO L. BAEZ
MICHAEL A. PALECKI
RUDOLPH "RUDY" BRADLEY



DIVISION OF COMPETITIVE MARKETS &
ENFORCEMENT
WALTER D'HAESELEER
DIRECTOR
(850) 413-6600

Public Service Commission

April 26, 2002

CERTIFIED

Mr. Tino Patel
Sky Telecom, Inc.
10376 E. Colonial Drive
Orlando, FL 32817

Re: Certification Requirement and inquiry into the *La Vida Loca* prepaid calling card.

Dear Mr. Patel:

Thank you for your reply to my letter dated March 21, 2002 (Enclosure 1). I understand that your company has ceased distributing and selling the *ONE CENT per minute* and *INDIA SKY* prepaid phone cards in Florida. However, this action does not resolve all of the issues addressed in my letter. The main purpose of my letter was to request that your company submit an application for a certificate to the Commission by April 12, 2002. As of today, our records do not show that an application has been submitted.

I still believe that Sky Telecom is reselling prepaid calling services in Florida and requires a certificate from the Commission. Let me clarify my position. It appears that one of Sky Telecom's business practices is to purchase PIN accounts for prepaid calling services from various underlying carriers at a discount, encode those PIN account numbers on various phone cards and sell them to the end users as a new product. If your company were merely a distributor of prepaid phone cards, it would not modify existing product or create new product, nor would it sell "virtual" PIN accounts - without a phone card - on the internet.

In addition, I am investigating the *La Vida Loca Tarjeta* prepaid phone card (Enclosure 2). The back of the card indicates that "R.C.I." is the service provider. However, our records do not list any company with the name of "R.C.I.". I called the customer service number on the back of the phone card and was told by a customer service representative named Darleen to call 1-800-215-4922. Upon calling the new customer service number, I was informed that Telegenius, Inc. is the service provider. However, Telegenius informed me that it is not familiar with the *La Vida Loca Tarjeta* prepaid phone card (Enclosure 3). Moreover, this phone card is listed on your website for sale in Florida (Enclosure 4). Based on these facts, it appears that your company may be producing this product for sale to end users in Florida. If not, please provide me with the name, address, phone number, and person I can contact for the company listed as "R.C.I." on the back of the phone card.

Mr. Tino Patel
Page 2
April 26, 2002

Mr. Patel, please provide me with a written reply to these issues by May 10, 2002. In your reply, please provide me with the requested information about "R.C.I.", and address the matter of applying for a certificate. If you are in the process of applying, please keep me informed of your progress. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Dale R. Buys
Regulatory Analyst
Bureau of Service Quality

Voice: 850-413-6536
Facsimile: 850-413-6537
Email: dbuys@psc.state.fl.us

DRB
Enclosures (4)

May 1, 2002

STATE OF FLORIDA



PUBLIC SERVICE COMMISSION

2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FL 32399-0850

TO:

Mr. Tino Patel
Sky Telecom , Inc.

FAX: 407-273-9888
VOICE: (Mr. Brian) 407-382-7888 Ext.
125

FROM:

Dale R. Buys
Division of Competitive Markets and
Enforcement

Fax: (850) 413-6537

Voice: (850) 413-6536

RE:

Application for Interexchange
Telecommunications Certificate

NUMBER OF PAGES INCLUDING COVER: 19

Mr. Patel:

Pursuant to our telephone conversation on Monday, April 29, 2002, I am sending you a facsimile of the application for an interexchange telecommunications certificate. I have included a copy of our web page that contains most of the information and the necessary forms. Please review our web page - <http://psc.state.fl.us/industry/telecom/ixc/iscapp.cfm> - and download the additional documents. Please note that you should include a tariff with your application. Should you need assistance with your application, please contact our certification section at 850-413-6480.

Sincerely,

A handwritten signature in cursive script that reads "Dale R Buys".

Dale R. Buys
Regulatory Analyst
dbuys@psc.state.fl.us

DOCKET NO. 020666-TI
DATE: August 8, 2002

Attachment D

TRANSMISSION VERIFICATION REPORT

TIME : 05/01/2002 09:11
NAME :
FAX :
TEL :

DATE, TIME	05/01 09:05
FAX NO./NAME	614072739888
DURATION	00:05:12
PAGE(S)	19
RESULT	OK
MODE	STANDARD ECM

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.		A. Received by (Please Print Clearly)	B. Date of Delivery 5-6-02
1. Article Addressed to: Telecom, Inc Attn: Mr. Brian 376 East Colonial Drive, Suite 135 Tallahassee, FL 32317 Certified		C. Signature D. Patel X <i>[Signature]</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
2. Article Number (Copy from service label) 7000116670 0012 81091 0797		D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Service Type		<input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee)		<input type="checkbox"/> Yes	

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

UNITED STATES POSTAL SERVICE

ORLANDO FL
PM
06 MAY
2002

First-Class Mail
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Pause For Box Fee

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Dale Buys

2002 MAY - 8 AM
DIVISION OF
COMPETITIVE SERVICE

32399-0850

Dale Buys

From: Dale Buys
Sent: Wednesday, June 19, 2002 11:38 AM
To: 'Tino@skytelecom.com'
Subject: Application for certificate from Florida Public Service Commission

Importance: High

Dear Mr. Patel:

During our phone conversation on April 29, 2002, you indicated to me that Sky Telecom would apply for a certificate from the Florida Public Service Commission and said that Mr. Brian would be handling the matter. Subsequently, I contacted Mr. Brian and sent him an application via certified mail. On May 8, 2002, I received the certified mail receipt indicating that Mr. D. Patel received the application package on May 6, 2002. As of today, our records do not indicate that Sky Telecom has submitted its application. Please respond to my email and provide me with an explanation as to why your company has yet to apply for a certificate. If you have any questions or concerns you can call me at (850) 413-6536.

Sincerely,

Dale R. Buys
Regulatory Analyst
Division of Competitive Markets and Enforcement
Florida Public Service Commission



Welcome to Skytelecom store.

Step through our secure ordering process to to receive your virtual pins.
 Sorry but all purchases are limited to \$ 40.00 in a 24 hour period.

Make your selections and proceed to the next step.

Card Type	Denomination	Order Quantity
AFRICAN SAFARI	\$10.00	<input type="text"/>
EUROPEAN EXPRESS	\$20.00	<input type="text"/>
FAR EAST	\$20.00	<input type="text"/>
FREEDOM	\$20.00	<input type="text"/>
INDIAS BEST	\$10.00	<input type="text"/>
INDIAS BEST	\$20.00	<input type="text"/>
INDIAS STAR	\$20.00	<input type="text"/>
INDO PAK	\$10.00	<input type="text"/>
INTERNATIONAL SKY	\$10.00	<input type="text"/>
INTERNATIONAL SKY	\$20.00	<input type="text"/>
LIBERTY EXPRESS	\$20.00	<input type="text"/>
MASALA	\$10.00	<input type="text"/>
MASALA	\$19.00	<input type="text"/>
PHONE BANK	\$10.00	<input type="text"/>
PHONE BANK	\$20.00	<input type="text"/>
SAHARA	\$10.00	<input type="text"/>
SAHARA	\$20.00	<input type="text"/>
SUPER ASIA	\$10.00	<input type="text"/>
SUPER ASIA	\$20.00	<input type="text"/>
TOP MINUTES	\$10.00	<input type="text"/>
TOP MINUTES	\$19.00	<input type="text"/>
UNI CONNECTION	\$20.00	<input type="text"/>
USA 2.2	\$10.00	<input type="text"/>
USA 2.2	\$18.00	<input type="text"/>

Total: \$0.00

Billing Information

E-mail

Full Name	<input type="text"/>
Street Address	<input type="text"/>
City	<input type="text"/>
State	<input type="text"/>
Zip Code	<input type="text"/>
County of Post Office	<input type="text"/>
Area Code & Phone #	<input type="text"/>
Credit Card Number	<input type="text"/> (MC, VISA, DISC ONLY)
Expiration Date	Month: <input type="text" value="January (01)"/> Year: <input type="text" value="1999"/>



Credit card fraud is a felony and will be prosecuted to the fullest extent of the law. We will use all means at our disposal to track down and turn over to authorities the guilty parties.