



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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22 SEP 18 PM 3:41
COMMISSION CLERK

DATE: SEPTEMBER 19, 2002

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

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (BUYS) DB
OFFICE OF THE GENERAL COUNSEL (W. KNIGHT) LUDIK B12

RE: DOCKET NO. 020667-TI - COMPLIANCE INVESTIGATION OF
AMERICANFONE, LLC FOR APPARENT VIOLATION OF RULE 25-
24.470, F.A.C., CERTIFICATE OF PUBLIC CONVENIENCE AND
NECESSITY REQUIRED, AND RULE 25-4.043, F.A.C., RESPONSE TO
COMMISSION STAFF INQUIRIES.

AGENDA: 10/01/02 - REGULAR AGENDA - PROPOSED AGENCY ACTION -
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\020667.RCM

CASE BACKGROUND

- April 26, 2002 - Staff received a complaint from a Florida consumer regarding billing by AmericanFone, LLC (AmericanFone) on her credit card for long distance telephone services.
April 29, 2002 - Staff sent a certified letter via U.S. Postal Service to AmericanFone requesting that the company investigate the customer complaint and submit its reply to staff by May 17, 2002. Staff also requested that AmericanFone submit its application for an interexchange company (IXC) certificate to the Commission by May 31, 2002.
May 6, 2002 - Staff received the U.S. Postal Service "green card" receipt indicating that Mr. Gilbert Carrillo signed for and received staff's certified letter on May 2, 2002.

DOCUMENT NO.
09965-02
9.18.02

DOCUM

09

CLERK

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- June 14, 2002 - Staff called AmericanFone at the number listed on the billing notification sent to the customer (1-888-741-0741). A recorded message indicated that all customer service representatives were busy. Subsequently, staff determined that AmericanFone has the same contact information as Planet Earth Communications (PEC), and that Mr. Michael Reed is the co-founder and CEO of PEC. Staff also determined that AmericanFone, iPhoneBill.com, and PEC are apparently the same entity.
- June 17, 2002 - Staff sent a facsimile of its certified letter dated April 26, 2002, to Mr. Michael Reed. Staff requested that Mr. Reed review staff's letter and provide a written reply by June 28, 2002.
- July 9, 2002 - Staff opened this docket to address AmericanFone's apparent violation of Rule Nos. 25-24.470 and 25-4.043, Florida Administrative Code.
- August 6, 2002 - Counsel for AmericanFone called staff to inquire about the purpose of the docket and a possible resolution to the apparent rule violations.
- August 29, 2002 - Counsel for AmericanFone submitted the company's proposal to settle and resolve the apparent rule violations cited in this docket (Attachment A).
- September 9, 2002 - Staff received the company's response to the customer complaint. The complaint has been resolved to the customer's satisfaction.

The Commission is vested with jurisdiction over these matters pursuant to Sections 364.183, 364.285, and 364.337, Florida Statutes. Accordingly, staff believes the following recommendations are appropriate.

DISCUSSION OF ISSUES

ISSUE 1: Should the Commission accept the settlement offer proposed by AmericanFone, LLC to resolve the apparent violation of Rule 25-24.470, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, and Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries?

RECOMMENDATION: Yes. The Commission should accept the settlement offer proposed by AmericanFone, LLC to contribute \$2,500 for each apparent rule violation, for a total of \$5,000, to the State General Revenue Fund to resolve the apparent violation of Rule 25-24.470, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, and Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries. If the Commission's Order is not protested, the contribution should be received by the Commission within fourteen calendar days from the issuance date of the Consummating Order and should identify the docket number and company name. The contribution should be forwarded to the Office of the Comptroller for deposit in the General Revenue Fund. If the contribution is not received within fourteen calendar days after the issuance of the Consummating Order, Certificate No. 7422 should be cancelled. If Certificate No. 7422 is cancelled, the company should be required to immediately cease and desist providing interexchange telecommunications services in Florida. **(Buys, W. Knight)**

STAFF ANALYSIS: Staff determined that AmericanFone was providing intrastate interexchange telecommunications service without first obtaining a certificate of public convenience and necessity from the Commission in apparent violation of Rule 25-24.470, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. Subsequently, staff sent the company (1) a certified letter, (2) a facsimile of its certified letter, and (3) attempted to contact the company via telephone call. AmericanFone failed to reply to staff's inquiries regarding the company's certification and a customer complaint within fifteen days in apparent violation of Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries. Hence, staff opened this docket to address AmericanFone's apparent rule violations.

After opening this docket, Counsel for AmericanFone contacted staff and agreed to file a settlement offer to resolve the apparent rule violations. AmericanFone's Counsel explained that

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AmericanFone is the parent company of FreedomStarr Communications, Inc. (FreedomStarr) which does have an IXC certificate. The Commission granted FreedomStarr Certificate No. 7422 on May 10, 2002, in Docket No. 991961-TI. Nevertheless, the company did not list its certificated name on bills sent to its customer as required by Rule 25-24.490, Florida Administrative Code, Customer Relations; Rules Incorporated, section 25-4.110(14), nor did it appear that the company was providing interexchange service in Florida under its certificated entity FreedomStarr.

To resolve the apparent violation of Rule Nos. 25-4.043 and 25-24.470, Florida Administrative Code, AmericanFone offered to do the following:

- Make a voluntary contribution to the State General Revenue Fund in the amount of \$5,000 - \$2,500 for each apparent rule violation.
- Properly register the names under which it will do business in Florida as fictitious names with the Florida Department of State, and include them as doing-business-as names on its FreedomStarr certificate.
- Provide and bill for its services under the names: Planet Earth Communications, iphonebill.com, USPhone, and AmericanFone.
- Establish procedures to handle all Florida customer complaints in accordance with Commission rules and appoint specific personnel to respond to customer and governmental agency inquiries.

The monetary amount of AmericanFone's settlement proposal is consistent with other settlement proposals the Commission has accepted in previous dockets for the same rules violations. In addition, in Docket No. 020929-TI, the company submitted a request to change the name on IXC Certificate No. 7422 to include the doing-business-as names for which it will bill and provide services. Therefore, AmericanFone has taken the necessary actions to correct the problems causing the apparent rule violations.

Accordingly, staff recommends that the Commission should accept the settlement offer proposed by AmericanFone, LLC to contribute \$2,500 for each apparent rule violation, for a total of \$5,000, to the State General Revenue Fund to resolve the apparent

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DATE: September 19, 2002

violation of Rule 25-24.470, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, and Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries. If the Commission's Order is not protested, the contribution should be received by the Commission within fourteen calendar days from the issuance date of the Consummating Order and should identify the docket number and company name. The contribution should be forwarded to the Office of the Comptroller for deposit in the General Revenue Fund. If the contribution is not received within fourteen calendar days after the issuance of the Consummating Order, Certificate No. 7422 should be cancelled. If Certificate No. 7422 is cancelled, the company should be required to immediately cease and desist providing interexchange telecommunications services in Florida.

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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 company's monetary contribution or upon cancellation of Certificate No. 7422. **(W. Knight)**

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 company's monetary contribution or upon cancellation of Certificate No. 7422.

DOCKET NO. 020667-TI
DATE: September 19, 2002

Attachment A

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

TYSONS CORNER

8000 TOWERS CRESCENT DRIVE

SUITE 1200

VIENNA, VIRGINIA 22182

(703) 918-2300

FACSIMILE

(703) 918-2450

www.kelleydrye.com

DIRECT LINE (703) 918-2311
EMAIL TConn@kelleydrye.com

2002 AUG 30 AM 11:10
DIVISION OF
COMPETITIVE SERVICES

August 29, 2002

NEW YORK, NY
WASHINGTON, DC
LOS ANGELES, CA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
BRUSSELS, BELGIUM
HONG KONG
AFFILIATE OFFICES
BANGKOK, THAILAND
JAKARTA, INDONESIA
MANILA, THE PHILIPPINES
MUMBAI, INDIA
TOKYO, JAPAN

VIA FEDERAL EXPRESS

Wayne Knight, Esq.
Staff Attorney
Florida Public Service Commission
c/o Division of Records and Reporting
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 020667-TI - Settlement Proposal

Dear Mr. Knight:

On behalf of our client, AmericanFone, LLC ("AmericanFone" or "Company"), we offer a good faith settlement in the above-referenced docket. This settlement offer replaces our previously-filed offer in its entirety.

AmericanFone proposes to settle the alleged violation of Rule 25-4.043, Florida Administrative Code, by (1) providing a statement of the actions AmericanFone has taken to remedy the problems causing its failure to respond to staff inquiries; (2) a statement that the Company will comply with all Commission rules in the future; (3) a statement that the Company has established procedures and processes to handle all Florida customer complaints in accordance with Commission rules; and (4) offering to make a voluntary contribution to the State of Florida General Revenue Fund.

The Company proposes to settle the alleged violation of Rule 25-24.470, Florida Administrative Code, by (1) demonstrating that the Company has properly registered the names under which it will do business in Florida and (2) providing to the Commission a statement clarifying the names in which the Company will provide and bill for its services in Florida. The Company further proposes that it make a voluntary contribution to the State of Florida General Revenue Fund to settle the alleged violation of Rule 25-4.110(14), Florida Administrative Code.

Wayne Knight, Esq.
August 29, 2002
Page Two

AmericanFone, LLC is not the operating entity, but is the parent company of FreedomStarr Communications, Inc., a certified provider of resold interexchange telecommunications services in the State of Florida. FreedomStarr Communications, Inc. will provide and bill for its services in Florida under the following fictitious names: (1) Planet Earth Communications; (2) iphonebill.com; (3) USPhone; and (4) AmericanFone. *Attachment 1* to this letter contains the letter registering FreedomStarr's fictitious names with the Public Service Commission as well as copies of the registration forms for the fictitious names filed with the Florida Department of State.

Without conceding that any grounds exist to justify the imposition of a penalty, and as part of its settlement offer for the alleged violation of Rules 25-4.043 and 25-4.110(14), Florida Administrative Code, the Company proposes a voluntary contribution of \$2,500.00 each (for a total contribution of \$5,000.00) to the State of Florida General Revenue Fund for costs associated with its investigation. Upon notification by the Commission that this offer has been accepted, the Company will forward its payment to the Commission.

The Company regrets any inconvenience its previous processes may have caused the Commission. It has now appointed specific personnel to respond to customer and governmental agency inquiries. Further, the Company has implemented specific internal processes to meet state and federal regulatory requirements. The Company is confident that the processes currently being implemented will prevent any confusion in the future. The Company remains fully committed to future compliance with all Commission rules and regulations.

Commission inquiries may be directed to:

FreedomStarr Communications, Inc.
Matthew Hoffman
8730 Sunset Blvd.
Suite 700
Los Angeles, CA 90069
Telephone (310) 734-3441
Fax (310) 289-9046
matthew@americanfone.com


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Attachment A

Wayne Knight, Esq.
August 29, 2002
Page Three

Thank you for your consideration. Please do not hesitate to contact me with questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'T Connor', with a long, sweeping flourish extending to the right.

Tamara E. Connor

cc: Dale R. Buys, Division of Competitive Markets and Enforcement
Matthew Hoffman

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Attachment A

Attachment 1

DOCKET NO. 020667-TI
DATE: September 19, 2002

KELLEY DRYE & WARREN LLP

Attachment A

A LIMITED LIABILITY PARTNERSHIP

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8000 TOWERS CRESCENT DRIVE

SUITE 1200

VIENNA, VIRGINIA 22182

(703) 918-2300

August 28, 2002

FACSIMILE

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tconnor@kelleydrye.com

NEW YORK, NY

WASHINGTON, DC

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

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AFFILIATE OFFICES

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MUMBAI, INDIA

TOKYO, JAPAN

VIA FEDERAL EXPRESS

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: FreedomStarr Communications, Inc. Fictitious Name Registration

Dear Ms. Bayó:

In compliance with Commission rules, please be advised that FreedomStarr Communications, Inc., a competitive telecommunications provider certified to provide resold interexchange services in Florida, intends to use the following fictitious names in the course of its business, throughout Florida: (1) USPhone; (2) iphonebill.com; (3) AmericanFone; and (4) Planet Earth Communications. The fictitious names have been registered with the Florida Department of State, as evidenced by the Applications for Registration, appended to this letter as *Attachment A*.

Please date-stamp the additional copy of this filing and return it to the undersigned in the enclosed self-addressed, stamped envelope.

Please do not hesitate to call me if you have any questions.

Respectfully submitted,


Tamara E. Connor

Enclosures

cc: Wayne Knight, Esq., Staff Attorney
Dale R. Buys, Division of Competitive Markets and Enforcement

DOCKET NO. 020667-TI
DATE: September 19, 2002

Attachment A

Attachment A

DOCKET NO. 020667-TI
DATE: September 19, 2002

Attachment A



FLORIDA DEPARTMENT OF STATE
Jim Smith
Secretary of State

August 22, 2002

AMERICANFONE
7985 SANTA MONICA BLVD., #7
LOS ANGELES, CA 90046

Subject: **AMERICANFONE**

REGISTRATION NUMBER: **G02234900051**

This will acknowledge the filing of the above fictitious name registration which was registered on August 22, 2002. This registration gives no rights to ownership of the name.

Each fictitious name registration must be renewed every five years between January 1 and December 31 of the expiration year to maintain registration. Three months prior to the expiration date a statement of renewal will be mailed.

IT IS THE RESPONSIBILITY OF THE BUSINESS TO NOTIFY THIS OFFICE IN WRITING IF THEIR MAILING ADDRESS CHANGES. Whenever corresponding please provide assigned Registration Number.

Should you have any questions regarding this matter you may contact our office at (850) 488-9000.

Reinstatement Section
Division of Corporations

Letter No. 302A00049470

Account number: 072100000032 Account charged: 50.00

APPLICATION FOR REGISTRATION OF FICTITIOUS NAME

Note: Acknowledgements/certificates will be sent to the address in Section 1 only.

FILED
02 AUG 22 PM 1:44
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Section 1

1. AmericanFone
Fictitious Name to be Registered (see instructions if name includes "Corp" or "Inc")
7985 Santa Monica Boulevard, #7

Mailing Address of Business
Los Angeles CA 90046
City State Zip Code

3. Florida County of principal place of business: Multiple
(see instructions if more than one county)

4. FEI Number: 33-0739161

This space for office use only

Section 2

A. Owner(s) of Fictitious Name If Individual(s): (Use an attachment if necessary):

1. Last First M.I. Address City State Zip Code

2. Last First M.I. Address City State Zip Code

B. Owner(s) of Fictitious Name If other than an individual: (Use attachment if necessary):

1. FreedomStarr Communications, Inc.
Entity Name
7985 Santa Monica Boulevard, #7
Address
Los Angeles CA 90046
City State Zip Code
Florida Registration Number F99000004982
FEI Number: 33-0739161
 Applied for Not Applicable

2. Entity Name Address City State Zip Code Florida Registration Number FEI Number: Applied for Not Applicable

Section 3

I (we) the undersigned, being the sole (all the) party(ies) owning interest in the above fictitious name, certify that the information indicated on this form is true and accurate. In accordance with Section 865.09, F.S., I (we) understand that the signature(s) below shall have the same legal effect as if made under oath. (At Least One Signature Required)

[Signature] Aug. 22, 2002
Signature of Owner Date

Signature of Owner Date

Phone Number: _____ Phone Number: _____

CR4E001B (1/02)

Section 4

**FOR CANCELLATION COMPLETE SECTION 4 ONLY:
FOR FICTITIOUS NAME OR OWNERSHIP CHANGE COMPLETE SECTIONS 1 THROUGH 4:**

I (we) the undersigned, hereby cancel the fictitious name _____
_____, which was registered on _____ and was assigned
registration number _____

Signature of Owner Date Signature of Owner Date

Mark the applicable boxes Certificate of Status — \$10 Certified Copy — \$30
FILING FEE: \$50

DOCKET NO. 020667-TI
DATE: September 19, 2002



Attachment A

FLORIDA DEPARTMENT OF STATE
Jim Smith
Secretary of State

August 22, 2002

IPHONEBILL.COM
7985 SANTA MONICA BLVD., #7
LOS ANGELES, CA 90046

Subject: **IPHONEBILL.COM**

REGISTRATION NUMBER: **G02234900054**

This will acknowledge the filing of the above fictitious name registration which was registered on August 22, 2002. This registration gives no rights to ownership of the name.

Each fictitious name registration must be renewed every five years between January 1 and December 31 of the expiration year to maintain registration. Three months prior to the expiration date a statement of renewal will be mailed.

IT IS THE RESPONSIBILITY OF THE BUSINESS TO NOTIFY THIS OFFICE IN WRITING IF THEIR MAILING ADDRESS CHANGES. Whenever corresponding please provide assigned Registration Number.

Should you have any questions regarding this matter you may contact our office at (850) 488-9000.

Reinstatement Section
Division of Corporations

Letter No. 502A00049472

Account number: 072100000032 Account charged: 50.00

APPLICATION FOR REGISTRATION OF FICTITIOUS NAME

Note: Acknowledgements/certificates will be sent to the address in Section 1 only.

FILED

02 AUG 22 PM 1:47

SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Section 1

1. iphonebill.com
Fictitious Name to be Registered (see instructions if name includes "Corp" or "Inc")
7985 Santa Monica Boulevard, #7

Mailing Address of Business
Los Angeles CA 90046
City State Zip Code

3. Florida County of principal place of business: Multiple

(see instructions if more than one county)

4. FEI Number: 33-0739161

This space for office use only

Section 2

A. Owner(s) of Fictitious Name If Individual(s): (Use an attachment if necessary):

1. Last First M.I. Address City State Zip Code

2. Last First M.I. Address City State Zip Code

B. Owner(s) of Fictitious Name If other than an individual: (Use attachment if necessary):

1. FreedomStarr Communications, Inc.
Entity Name
7985 Santa Monica Boulevard, #7
Address
Los Angeles CA 90046
City State Zip Code
Florida Registration Number F9900000 4982
FEI Number: 33-0739161
 Applied for Not Applicable

2. Entity Name Address City State Zip Code Florida Registration Number FEI Number: Applied for Not Applicable

Section 3

I (we) the undersigned, being the sole (all the) party(ies) owning interest in the above fictitious name, certify that the information indicated on this form is true and accurate. In accordance with Section 865.09, F.S., I (we) understand that the signature(s) below shall have the same legal effect as if made under oath. (At Least One Signature Required)

[Signature] Aug 20, 2002
Signature of Owner Date

Signature of Owner Date

Phone Number: _____ Phone Number: _____

CR4E001B (1/02)

Section 4

**FOR CANCELLATION COMPLETE SECTION 4 ONLY:
FOR FICTITIOUS NAME OR OWNERSHIP CHANGE COMPLETE SECTIONS 1 THROUGH 4:**

I (we) the undersigned, hereby cancel the fictitious name _____
_____, which was registered on _____ and was assigned
registration number _____

Signature of Owner Date Signature of Owner Date

Mark the applicable boxes Certificate of Status — \$10 Certified Copy — \$30

FILING FEE: \$50

DOCKET NO. 020667-TI
DATE: September 19, 2002

Attachment A



FLORIDA DEPARTMENT OF STATE
Jim Smith
Secretary of State

August 22, 2002

USPHONE
7985 SANTA MONICA BLVD., #7
LOS ANGELES, CA 90046

Subject: **USPHONE**

REGISTRATION NUMBER: **G02234900052**

This will acknowledge the filing of the above fictitious name registration which was registered on August 22, 2002. This registration gives no rights to ownership of the name.

Each fictitious name registration must be renewed every five years between January 1 and December 31 of the expiration year to maintain registration. Three months prior to the expiration date a statement of renewal will be mailed.

IT IS THE RESPONSIBILITY OF THE BUSINESS TO NOTIFY THIS OFFICE IN WRITING IF THEIR MAILING ADDRESS CHANGES. Whenever corresponding please provide assigned Registration Number.

Should you have any questions regarding this matter you may contact our office at (850) 488-9000.

Reinstatement Section
Division of Corporations

Letter No. 202A00049471

Account number: 072100000032 Account charged: 50.00

APPLICATION FOR REGISTRATION OF FICTITIOUS NAME

Note: Acknowledgements/certificates will be sent to the address in Section 1 only.

FILED
02 AUG 22 PM 1:46
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Section 1

1. **USPhone**
Fictitious Name to be Registered (see instructions if name includes "Corp" or "Inc")
7985 Santa Monica Boulevard, #7

Mailing Address of Business
Los Angeles CA 90046
City State Zip Code

3. Florida County of principal place of business: Multiple
(see instructions if more than one county)

4. FEI Number: 33-0739161

This space for office use only

Section 2

A. Owner(s) of Fictitious Name If Individual(s): (Use an attachment if necessary):

1. Last _____ First _____ M.I. _____ Address _____ City _____ State _____ Zip Code _____	2. Last _____ First _____ M.I. _____ Address _____ City _____ State _____ Zip Code _____
--	--

B. Owner(s) of Fictitious Name If other than an individual: (Use attachment if necessary):

1. <u>FreedomStarr Communications, Inc.</u> Entity Name <u>7985 Santa Monica Boulevard, #7</u> Address <u>Los Angeles</u> <u>CA</u> <u>90046</u> City State Zip Code Florida Registration Number <u>F9900000 4982</u> FEI Number: <u>33-0739161</u> <input type="checkbox"/> Applied for <input type="checkbox"/> Not Applicable	2. _____ Entity Name Address _____ City _____ State _____ Zip Code _____ Florida Registration Number _____ FEI Number: _____ <input type="checkbox"/> Applied for <input type="checkbox"/> Not Applicable
--	---

Section 3

I (we) the undersigned, being the sole (all the) party(ies) owning interest in the above fictitious name, certify that the information indicated on this form is true and accurate. In accordance with Section 865.09, F.S., I (we) understand that the signature(s) below shall have the same legal effect as if made under oath. (At Least One Signature Required)

[Signature] Aug 20, 2002
Signature of Owner Date

Signature of Owner Date

Phone Number: _____ Phone Number: _____

CR4E001B (1/02)

Section 4

**FOR CANCELLATION COMPLETE SECTION 4 ONLY:
FOR FICTITIOUS NAME OR OWNERSHIP CHANGE COMPLETE SECTIONS 1 THROUGH 4:**

I (we) the undersigned, hereby cancel the fictitious name _____
_____, which was registered on _____ and was assigned
registration number _____

Signature of Owner Date

Signature of Owner Date

Mark the applicable boxes Certificate of Status — \$10 Certified Copy — \$30
FILING FEE: \$50

DOCKET NO. 020667-TI
DATE: September 19, 2002

Attachment A



FLORIDA DEPARTMENT OF STATE
Jim Smith
Secretary of State

August 22, 2002

PLANET EARTH COMMUNICATIONS
7985 SANTA MONICA BLVD., #7
LOS ANGELES, CA 90046

Subject: **PLANET EARTH COMMUNICATIONS**

REGISTRATION NUMBER: **G02234900049**

This will acknowledge the filing of the above fictitious name registration which was registered on August 22, 2002. This registration gives no rights to ownership of the name.

Each fictitious name registration must be renewed every five years between January 1 and December 31 of the expiration year to maintain registration. Three months prior to the expiration date a statement of renewal will be mailed.

IT IS THE RESPONSIBILITY OF THE BUSINESS TO NOTIFY THIS OFFICE IN WRITING IF THEIR MAILING ADDRESS CHANGES. Whenever corresponding please provide assigned Registration Number.

Should you have any questions regarding this matter you may contact our office at (850) 488-9000.

Reinstatement Section
Division of Corporations

Letter No. 502A00049467

Account number: 072100000032 Account charged: 50.00

APPLICATION FOR REGISTRATION OF FICTITIOUS NAME

Note: Acknowledgements/certificates will be sent to the address in Section 1 only.

FILED
02 AUG 22 PM 1:41
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Section 1

1. **Planet Earth Communications**
Fictitious Name to be Registered (see instructions if name includes "Corp" or "Inc")
7985 Santa Monica Boulevard, #7

Mailing Address of Business
Los Angeles CA 90046
City State Zip Code

3. Florida County of principal place of business: Multiple
(see instructions if more than one county)

4. FEI Number: 33-0739161

This space for office use only

Section 2

A. Owner(s) of Fictitious Name If Individual(s): (Use an attachment if necessary):

1. Last First M.I. Address City State Zip Code

2. Last First M.I. Address City State Zip Code

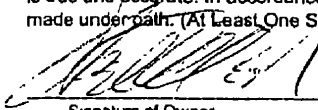
B. Owner(s) of Fictitious Name If other than an individual: (Use attachment if necessary):

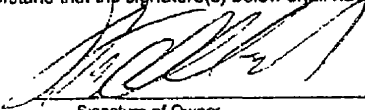
1. **FreedomStarr Communications, Inc.**
Entity Name
7985 Santa Monica Boulevard, #7
Address
Los Angeles CA 90046
City State Zip Code
Florida Registration Number F99000004982
FEI Number: 33-0739161
 Applied for Not Applicable

2. Entity Name Address City State Zip Code Florida Registration Number FEI Number: Applied for Not Applicable

Section 3

I (we) the undersigned, being the sole (all the) party(ies) owning interest in the above fictitious name, certify that the information indicated on this form is true and accurate. In accordance with Section 865.09, F.S., I (we) understand that the signature(s) below shall have the same legal effect as if made under oath. (At Least One Signature Required)

 Aug. 20, 2002
Signature of Owner Date

 _____
Signature of Owner Date

Phone Number: _____ Phone Number: _____

CR4E001B (1/02)

Section 4

**FOR CANCELLATION COMPLETE SECTION 4 ONLY:
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Signature of Owner Date

Signature of Owner Date

Mark the applicable boxes Certificate of Status — \$10 Certified Copy — \$30
FILING FEE: \$50