

State of Florida



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

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

DATE: FEBRUARY 6, 2003

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

FROM: DIVISION OF COMPETITIVE MARKETS & ENFORCEMENT (BUYS)  
OFFICE OF THE GENERAL COUNSEL (W. KNIGHT) *WOK D/K*

RE: DOCKET NO. 030040-TI - COMPLIANCE INVESTIGATION OF SUPREME  
TELECOM SYSTEMS, INC. FOR APPARENT VIOLATION OF RULE 25-  
24.910, F.A.C., CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY REQUIRED.

AGENDA: 02/18/03 - REGULAR AGENDA - PROPOSED AGENCY ACTION -  
INTERESTED PERSONS MAY PARTICIPATE

CRITICAL DATES: NONE

SPECIAL INSTRUCTIONS: NONE

FILE NAME AND LOCATION: S:\PSC\CMP\WP\030040.RCM

RECEIVED  
03 FEB - 6 AM 11: 43  
COMMISSION CLERK

CASE BACKGROUND

- August 7, 2002 - The Commission received a complaint from a Florida consumer regarding a prepaid phone card. The phone card lists STS as the prepaid calling services provider. Staff determined that STS is an acronym for Supreme Telecom Systems, Inc. (STS), located in Fort Worth, Texas, and that the company does not have a certificate of public convenience and necessity (certificate) to provide interexchange company (IXC) telecommunications in Florida.
- October 22, 2002 - Staff sent a certified letter (Attachment A) via U.S. Postal Service and facsimile to STS. A response was due on November 6, 2002. The U.S. Postal Service green card receipt indicates that the company received the letter on October 28, 2002.

DOCUMENT NUMBER DATE

01249 FEB-6 8

FPSC-COMMISSION CLERK

DOCKET NO. 030040-TI  
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- October 23, 2002 - Staff received a call from Mr. Peter Texiera at STS regarding the letter. He stated that the *Express Call* phone card is a STS product and is sold in the Tampa Bay area. He also stated that he would respond to the consumer complaint and submit an application for an IXC certificate.
- November 14, 2002 - Staff sent a second certified letter (Attachment B) via U.S. Postal Service to STS. A response was due on November 29, 2002. The U.S. Postal Service green card receipt indicates that the company received the letter on November 18, 2002.
- December 10, 2002 - Staff received a hand written letter (Attachment C) from Mr. Texiera on behalf of STS stating that the company has resolved the customer's complaint and that he would be contacting staff to obtain information on filing an application. STS made no further contact with staff.
- December 13, 2002 - Staff confirmed that the consumer was satisfied with the company's resolution and closed the complaint that initiated this matter.
- January 9, 2003 - Staff opened this docket to address STS'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 prepaid calling service providers 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 Supreme Telecom Systems, Inc. for apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, to be paid to the Florida Public Service Commission within fourteen calendar days after the issuance of the Consummating Order?

**RECOMMENDATION:** Yes. If STS fails to timely protest the Commission's Order, and fails to obtain an IXC Certificate of Public Convenience and Necessity, the company should also 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, W. Knight)**

**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.

As outlined in the case background, staff determined that STS is providing prepaid calling services to the public in Florida and has not obtained a certificate in apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required. The company indicated to staff, both verbally and in writing, that it would apply for a certificate. Staff initially requested that STS submit its application by November 13, 2002. Staff made a second request for STS to submit its application by November 29, 2002. As of the date of filing this recommendation, STS has not filed its application. Staff believes that the company is aware of its

DOCKET NO. 030040-TI  
DATE: February 6, 2003

requirement to obtain a certificate and has had sufficient time to submit its application.

Further, staff believes that STS'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 STS'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).

Based on the aforementioned, staff recommends that the Commission should impose a \$25,000 penalty on STS for apparent violation of Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required.

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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. 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 Department of Financial Services. This docket should be closed administratively upon either receipt of the payment of the penalty or upon the referral of the penalty to the Department of Financial Services. **(W. Knight)**

**STAFF ANALYSIS:** Whether staff's recommendation on Issue 1 is approved or denied, the result will be a Proposed Agency Action Order. If no timely protest to the Proposed Agency Action is filed within 21 days of the date of issuance of the Order, this docket should be closed administratively upon receipt of the payment of the penalty or referral of the penalty to the Department of Financial Services.

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

STATE OF FLORIDA



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

## Public Service Commission

October 22, 2002

**Via Facsimile and Certified Mail**  
813-630-3044 and 817-335-5800

Mr. Farukh Aslam  
President  
American Prepaid Telecom / Supreme Telecom Systems, Inc. (STS)  
515 Houston Street  
Fort Worth, Texas 76102

**Re: Consumer complaint Request No. 497705T and provision of prepaid calling services.**

Dear Mr. Aslam:

We have received the enclosed consumer complaint. Based on our research, it appears that your company, in association with Mr. Peter J. Texiera and The Card Room.Com, Inc., are providing prepaid calling services in Florida through the distribution of the *Express Call* prepaid phone card. Please investigate the consumer's complaint and provide me with a response, in writing, to all the consumer's concerns within fifteen (15) days from the date of this letter, no later than **November 6, 2002**. Rule 25-4.043, Florida Administrative Code, states:

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.

Please be aware that in the recent past, the Commission has imposed a \$10,000 penalty on companies that have not complied with Rule 25-4.043, Florida Administrative Code.

In addition, our records do not list either American Prepaid Telecom, Supreme Telecom Systems, Inc., or The Card Room.Com, Inc. as having obtained a certificate of public convenience and necessity from the Commission. Rule 25-24.910, Florida Administrative Code, Certificate of Public Convenience and Necessity Required, states:

A company shall not provide PPCS [prepaid calling services] 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

Mr. Farukh Aslam  
Page 2  
October 22, 2002

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.

Mr. Aslam, to rectify this matter, your company should submit an application for an interexchange company certificate to the Division of the Commission Clerk and Administrative Services no later than **November 13, 2002**. 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](http://www.psc.state.fl.us)

If you have any questions or wish to discuss this, please let me know. I can be reached at (850) 413-6536.

Sincerely,



Dale R. Buys  
Regulatory Analyst  
Bureau of Service Quality

DRB  
Enclosure

cc: Mr. Peter J. Texiera  
The Card Room.Com, Inc.  
5404 Comfort Drive  
Tampa, Florida 33610

Florida Department of Revenue  
Certification Section (J. Gilchrist)

Request No. 497705T Name MCCARTHY ,TERESA MS. Business Name \_\_\_\_\_

<b>Consumer Information</b>  Name: TERESA MCCARTHY  Business Name:  Svc Address: 121 46TH AVENUE #2B   County: Pinellas Phone: (727)-367-6428  City/Zip: Saint Petersburg / 33706-  Account Number:  Caller's Name: TERESA MCCARTHY  Mailing Address: 121 46TH AVENUE #2B  City/Zip: SAINT PETERSBURG ,FL 33706-  Can Be Reached:  Tracking Number:	<b>Florida Public Service          Commission - Consumer Request</b> <b>2540 Shumard Oak Boulevard</b> <b>Tallahassee, Florida 32399</b> <b>850-413-6100</b>	<b>PSC Information</b>  Assigned To: DALE BUYS Entered By: DRB Date: 10/22/2002 Time: 10:27 Via: MAIL Prelim Type: PREPAID CALL  PO: Disputed Amt: 0.00
	<b>Utility Information</b> Company Code: NA Company: American Prepaid Telecom/STS Attn. Response Needed From Company? N Date Due: 11/13/2002 Fax:	Supmntl Rpt Req'd: / / Certified Letter Sent: / / Certified Letter Rec'd: / /
	Interim Report Received: / /  Reply Received: / / Reply Received Timely/Late: Informal Conf.: N	Closed by: Date: / / Closeout Type: Apparent Rule Violation:

This complaint was originally received on 08/07/02 by CAF and complaint 482141T was opened against Saturn Telecommunications Services, Inc. (Saturn). Saturn's response to complaint 482141T stated that it does not provide prepaid calling cards, and that there may be another company using the initials STS.

9/16/2002 Case reassigned to the Division of Competitive Markets and Enforcement. P.Lowery

9/18/02: CMP staff called customer service number on phone card. Customer service representative would not provide staff with the name of the service provider, nor the name of the company that was providing customer service. Staff was unable to locate any prepaid phone card company using the name STS. drbuys

10/17/02: Since the last entry, staff located the company apparently providing service for the Express Call phone card; American Prepaid Telecom/STS, located at 515 Houston Street, Fort Worth, Texas 76102. A local company, The Card Room.com, Inc. may be distributing the cards in Tampa. The customer called to check on the

Request No. 497705T Name MCCARTHY ,TERESA MS. Business Name \_\_\_\_\_



status of the case. Staff called customer at (727) 367-6428, and informed her that staff located the company providing the service and we will send an inquiry to the company.

Ms. McCarthy explained that she only received 26 minutes of call time on the Express Call phone card that lists 142 minutes. She explained she tried to call customer service but was cut off and hung up on. drbuy

10/22/02: CMP staff closed complaint 482141T and opened this complaint, 497705T, against American Prepaid Telecom/STS. Staff drafted letter to company requesting that STS investigate the consumer's complaint and provide a written reply by November 6, 2002. drbuys

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6  
1

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Request No. 497705T Name MCCARTHY ,TERESA MS. Business Name \_\_\_\_\_

To the Florida Public Serv. Comm

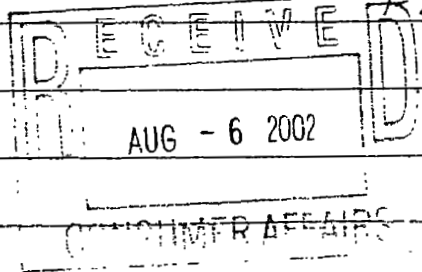
I'm enclosing copy of a prepaid  
Tel card I purchased at a mobil  
gas station beside me. All the use  
I got from it was 26 mins to call  
mass. There was 30 mins left they said  
& when I called again they said no  
time left, just a wk later, I called  
Ireland a few times got no answer &  
was charged for it. When I called  
cust serv no on card they said call back  
during bus hrs & hung up even tho  
it was bus. hrs. Also say no of mins to  
speak & I'm cut off before time is up.  
Would never buy it again

Teresa M. Carthy

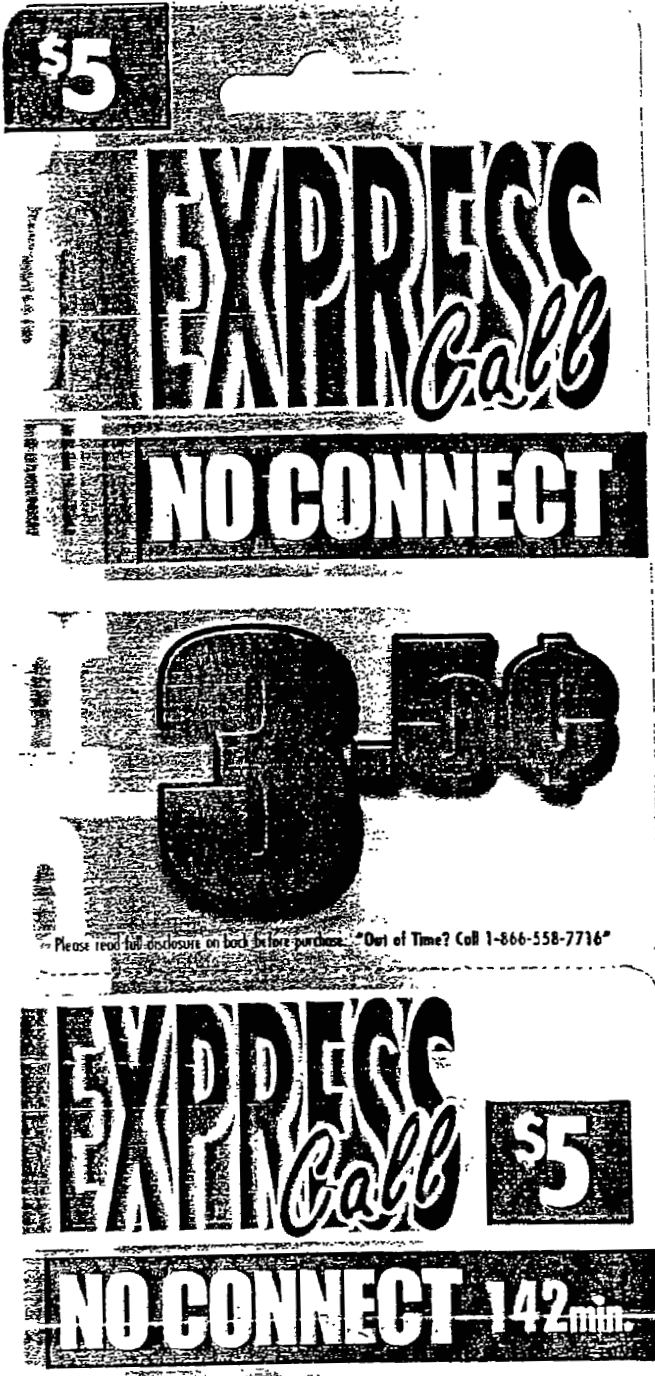
Tel 727-367-6428

121-46th Ave #28

St. Pete Beh.



DOCKET NO. 030040-TI  
 DATE: February 6, 2003



**\$5**  
**EXPRESS CALL**  
 EASY TO USE!  
 LOWEST RATES WORLDWIDE!

**INSTRUCTIONS**

1. Dial the 800 access number on your card, and enter your PIN number.
2. To make a domestic call, dial the phone number you wish to call, including the area code.
3. To make an international call, Dial:011 + Country Code + City Code + Phone #.
4. To make another call, Do not hang up, press \*.

**RATES**

1. Domestic rate is 3.5¢ per minute.
2. International rates vary by country.
3. Surcharge for each call: Domestic .0¢ International 0¢.
4. 0-28% will be deducted for taxes and operational expenses.
5. Rates and Surcharges may change without notice.
6. Time expires 90 days after first use.
7. A 50¢ biweekly maintenance fee applies after first use.
8. Calls made from payphones will be charged .64¢ to comply with FCC ruling.
9. Retail minutes displayed are before all applicable operational fees. Actual talk time will vary (Calls are billed in 1-3 minute increments)

**OUT OF CHANGE / TIME?**  
 For Collect Calls Dial:  
 Para Llamadas por Cobrar:  
**1-866-558-7716**



1. Dial: **1-800-709-5628**      Marque: **1-800-709-5629**

2. Follow instructions.      2. Siga las instrucciones.  
 3. International Calls.      3. Llamadas Internacionales  
 011+Country Code+City Code      011+Código del País+Código  
 +Local Number      de la Ciudad+el Número Telefónico

**PIN:** **292 501 2153**

\* To make additional calls, press \*. Do not hang up. Per FCC ruling, .64¢ deducted on all toll-free pay phone calls.  
 \* Rates may vary and are subject to change without notice. Calls billed in 1-3 minute increments.  
 \* Time expires 90 days after first use. 0-28% applicable taxes and operational fees deducted from total minutes.  
 \* Card rates and operational fees may apply universally to all rates and surcharges, and may change without notice.  
 \* Retail minutes displayed are before all applicable operational fees. Actual talk time will vary.

\* Domestic connect fee: 0      International connect fee up to: 0      Directly service fee: .50  
 Network Services Provider: **STS**      For customer service, call: **1-800-558-6075**  
 User's Contact #:      Servicio al Cliente: **005003405**

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>Print your name and address on the reverse so that we can return the card to you.</li><li>Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Received by (Please Print Clearly)	B. Date of Delivery 10-18-02
1. Article Addressed to:	C. Signature X <i>Anacurky</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
Mr. Farukh Aslam, President American Prepaid Telecom/Supreme Telecom Systems, Inc. (STS), 515 Housto Street Forth Worth, Texas 76102 	D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input type="checkbox"/> No	
2. 7001 2510 0007 6217 0984	<input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D. /? (Extra Fee) <input type="checkbox"/> Yes	

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

Florida Public Service Commission  
Mr. Dale Buys  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

DIVISION OF  
COMPETITIVE SERVICES

DOCKET NO. 030040-TI  
DATE: February 6, 2003

STATE OF FLORIDA



A handwritten signature in black ink, appearing to read "Walter D'Haeseleer".

Attachment B

COMMISSIONERS:  
LILA A. JABER, CHAIRMAN  
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

November 14, 2002

**Via Facsimile and Certified Mail**  
813-630-3044 and 817-335-5800

Mr. Farukh Aslam  
President  
American Prepaid Telecom / Supreme Telecom Systems, Inc. (STS)  
515 Houston Street  
Fort Worth, Texas 76102

**Re: Failure to respond to Commission staff inquiry and submit an application for an IXC certificate.**

Dear Mr. Aslam:

On October 22, 2002, I sent your company a letter (copy enclosed) requesting that STS investigate a consumer complaint regarding the *Express Call* prepaid phone card and submit an application for an interexchange company (IXC) certificate. A reply to the consumer complaint was due on November 6, 2002, and the application was supposed to be submitted no later than November 13, 2002. On October 23, 2002, I received a call from Mr. Peter J. Trexiera. Mr. Trexiera stated that your company would reply to the customer complaint and submit an application. As of today, I have not received a written reply to my inquiry, nor has the Commission received your company's application.

Rule 25-4.043, Florida Administrative Code, Response to Commission Staff Inquiries, states:

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.

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

A company shall not provide PPCS [prepaid calling services] 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

Mr. Farukh Aslam  
Page 2  
November 14, 2002

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.


Mr. Aslam, if we do not receive your company's written reply to the consumer's complaint and STS's application for an IXC certificate by **November 29, 2002**, a docket will be opened to initiate formal enforcement action for STS's apparent violation of the aforementioned rules. 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 of the Commission. Should you have any questions regarding this matter, please call me at 850-413-6536.

Sincerely,



Dale R. Buys  
Regulatory Analyst  
Bureau of Service Quality

DRB  
Enclosure

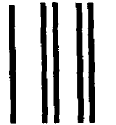
SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li></ul> <p>Mr. Farukh Aslam, President American Prepaid Telecom/ Supreme Telecom Systems, Inc. (STS) 515 Houston Street Fort Worth, Texas 76102</p> 		A. Received by (Please Print Clearly)	B. Date of Delivery 11-18-02
		C. Signature <i>Esmelda Ojeda</i>	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
		rent from item 1?	<input type="checkbox"/> Yes <input type="checkbox"/> No
		address below:	
		Express Mail Return Receipt for Merchandise C.O.D. Extra Fee)	<input type="checkbox"/> Yes

2. 7002 0860 0001 1754 3149

PS Form 3811, March 2001 Domestic Return Receipt

102595-01-M-1424

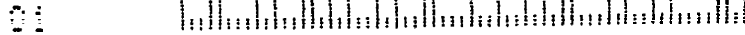
UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Florida Public Service Commission  
Mr. Dale Buys  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

2002 NOV 25 AM 11:06  
DIVISION OF  
COMPETITIVE SERVICES



Dear Mr. Buys

I am replying to your second letter I received via fax and certified mail on Nov 14, 2002. First of all I would like to apologize that I have not responded to you sooner.

ON 10-23-02 I pulled a call detail report on the card and PIN # you provided. The report shows the following the customer in fact did call ireland & was connected for 1 minute. She then made several calls to ireland again some say she was connected and deducted time others say <sup>the customer</sup> she did not connect and no time was deducted. We have also put an 8 second delay on our cards which when a call goes out we do not bill. Regardless the customer then contacted us at customer service disputing monies taken off of the card and was issued a credit. Another problem is we had a software issue with our weekly maintenance fee was working every 3 days instead of weekly. I do not know if the customer was credited <sup>this monies</sup> these monies or not what T. do no is we have since put the card a <sup>is</sup> <sup>or</sup> <sup>value</sup> value with no fees and ~~will~~ make this customer



happy. I hope this investigation answers  
any of your questions. Feel free to  
call if you have any further questions  
on behalf of Supreme  
Telecom

P.S.

87-336-0000  
87-999-0240

Peter Texeira

Peter Texeira

P.S.

I will be in contact  
with you to get into  
on proper licensing.  
Thanks

Supreme Telecom Systems, Inc.

Call Detail Record

10/23/02

Include all months			Express Call \$5 Card			Company 1506 PIN Sequence 005003405		
Mon	Date/day	Time	Call To	Duration	Originate	Terminate	Charge	Total
Jul	07-06-02 Sat	3:08:29 pm	Ireland	1.0	727-367-6428	011-353-934508	0.30	0.30
	07-06-02 Sat	3:09:46 pm	Ireland	0.0	727-367-6428	5 011-353-924508	0.00	0.30
	07-06-02 Sat	3:18:44 pm	Ireland	0.0	727-367-6428	5 011-353-214775	0.00	0.30
	07-06-02 Sat	3:22:41 pm	Ireland	0.4	727-367-6428	027 011-353-934508	0.30	0.60
	07-07-02 Sun	3:19:39 pm	Ireland	0.0	727-367-6428	5 011-353-214775	0.00	0.60
	07-07-02 Sun	4:17:01 pm	Ireland	0.5	727-367-6428	027 011-353-214775	0.30	0.90
	07-07-02 Sun	4:29:36 pm	Ireland	0.0	727-367-6428	087 011-353-214775	0.00	0.90
	07-08-02 Mon	07:43:15 am	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	0.90
	07-10-02 Wed	08:37:56 am	Ireland	0.1	727-367-6428	027 011-353-214775	0.30	1.20
	07-10-02 Wed	08:37:59 am	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	1.20
	07-10-02 Wed	08:55:47 am	Ireland	0.1	727-367-6428	027 011-353-214775	0.30	1.50
	07-10-02 Wed	08:55:51 am	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	1.50
	07-10-02 Wed	09:20:08 am	Ireland	0.1	817-698-0987	027 011-353-214775	0.30	1.80
	07-10-02 Wed	09:21:26 am	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	1.80
	07-11-02 Thu	07:57:42 am	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	1.80
	07-14-02 Sun	3:23:26 pm	Ireland	0.0	727-367-6428	027 011-353-214775	0.00	1.80
	07-15-02 Mon	7:17:37 pm	US, N HAMPSHIRE	25.9	727-367-6428	027 160-342-48997	1.19	2.99
	07-17-02 Wed	09:14:56 am	US, MASSACHUS.	0.0	727-367-6428	161-732-72316	0.00	2.99
	07-26-02 Fri	08:41:58 am	<Rate Error>	0.0	727-367-6428	800-709-5628	0.00	2.99
	07-26-02 Fri	08:57:52 am	<Rate Error>	0.0	727-367-6428	800-709-5628	0.00	2.99
	07-30-02 Tue	09:27:20 am	<Rate Error>	0.0	727-367-6428	800-709-5628	0.00	2.99

11/14/02  
- 18 -

credited  
for money  
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5

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DATE: February 6, 2003

Attachment C

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515 Houston St. #800  
Fl. weel, TX. 76012



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Attn Dale R. buy s  
Regulatory Analyst  
Bureau of Service Quality  
Capital Circle office Center  
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Tallahassee, Fl. 32399-0850

32399-0850 01

