

RECEIVED EPSC
WILKINSON) BARKER) KNAUER) LLP

11 JAN 10 PM 2:49

COMMISSION
CLERK

RECEIVED CENTER
11 JAN 10 AM 7:28

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLaw.COM
ROBERT D. PRIMOSCH
202.383.3362
RPRIMOSCH@WBKLAW.COM

January 6, 2011

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

110000-OT

Re: *Kiskiminetas Communications LLC*
FCC Application to Discontinue Prepaid Domestic and International
Long Distance Service

Dear Sir or Madam:

As required under Section 63.71(a) of the rules of the Federal Communications Commission (47 C.F.R. § 63.71), attached hereto is a copy of the application submitted by Kiskiminetas Communications LLC to the FCC for authority to discontinue its prepaid domestic and international long distance service.

Please contact the undersigned if you have any questions.

Very truly yours,

WILKINSON BARKER KNAUER, LLP



By: Robert D. Primosch

Enclosure

DOCUMENT ID: 110000-OT

00242 JAN 10 =

FPSC-COMMISSION CLERK

COPY

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
WWW.WBKLaw.COM
ROBERT D. PRIMOSCH
202.383.3362
RPRIMOSCH@WBKLaw.COM

January 6, 2011

BY HAND DELIVERY

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW, Room TW-A325
Washington, D.C. 20554
ATTN: Competition Policy Division, Wireline Competition

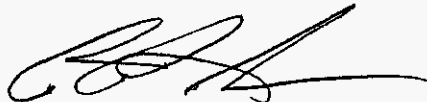
Re: *Section 63.71 Application of Kiskiminetas Communications LLC for
Authority to Discontinue Prepaid Resold Domestic and International Long
Distance Service*

Dear Ms. Dortch:

On behalf of Kiskiminetas Communications LLC ("Kiskitel"), and pursuant to Sections 63.19 and 63.71 of the Commission's Rules, we hereby submit an original and five copies of Kiskitel's application to discontinue its prepaid, resold domestic and international long distance service. As required under Section 63.19, a separate copy of this filing is being provided contemporaneously to the Commission's International Bureau.

If you have any questions regarding this application, please contact the undersigned.

Respectfully submitted,



Robert D. Primosch

Attachments

cc: David Krech
Sumita Mukhoty

DOCUMENT NUMBER DATE

00242 JAN 10 =

FPSC-COMMISSION CLIENT

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Application of Kiskiminetas Communications LLC)
for Authority Pursuant to Section 214 of the) File No. 11 - _____
Communications Act to Discontinue U.S. Domestic)
and International Telecommunications Service)

To: Chief, Wireline Competition Bureau

SECTION 63.71 APPLICATION

Kiskiminetas Communications LLC (“Kiskitel”), by its counsel, hereby seeks authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Sections 63.19 and 63.71 of the Commission’s Rules,¹ to discontinue its provision of prepaid, resold domestic interstate, interexchange and international telecommunications service.² In support of this Application, Kiskitel provides the following information:

I. Information Required by 47 C.F.R. § 63.71(a)(1) – (a)(4)

1. Name and Address of Carrier

Kiskiminetas Communications LLC
1999 Gulfmart Street, Suite 514
San Antonio, Texas 78217
Attn: John Goocher

¹ 47 C.F.R. § 63.19, 63.71. Per Section 63.19, a copy of this filing has been submitted to the International Bureau under separate cover.

² See FCC File No. ITC-214-20100111-00015 (granted Jan. 29, 2010), which authorizes Kiskitel to provide Global or Limited Global Facilities-Based and Global or Limited Global Resale Service.

DOCUMENT NUMBER DATE
00242 JAN 10 =
FPC-COMMISSION CLERK

2. Date of Planned Service Discontinuance

Kiskitel provides resold domestic and international long distance service via prepaid calling cards sold through three wholesale distributors in Kansas, Florida and Texas.³ Kiskitel plans to discontinue service on or after January 31, 2011, but no earlier than 31 days after the Commission releases public notice of this filing.

3. Points of Geographic Areas of Service Affected

As noted above, Kiskitel's prepaid calling cards are sold through wholesale distributors in Kansas, Florida and Texas, which in turn sell the cards to convenience stores. Service will be discontinued at all locations where a customer attempts to place a call with his or her Kiskitel card.

4. Description of Type of Service Affected

Pursuant to this application, Kiskitel seeks authority to discontinue its resold domestic and international long distance service as described above. Kiskitel does not provide any other service.

II. Notice to Customers

Kiskitel's distributors do not maintain lists of end-user customers, and it is otherwise impossible for Kiskitel to determine who has purchased its calling cards at the retail level. Moreover, Kiskitel's prepaid calling cards are a discretionary service that is strictly temporary in nature and thus is not "discontinued" in the traditional sense. That is, no written notification of service discontinuance is provided when a customer's prepaid calling card account is depleted,

³ The distributors are, respectively, ENT, LLC; Krush Communications; and Touch Telecom, LLC.

since the customer is aware that service is available only if there are funds in that account.⁴ Nevertheless, to ensure compliance with the notice requirements of Section 63.71(a) under these circumstances, Kiskitel sent to each of its wholesale distributors via electronic mail the attached notice dated January 3, 2011, providing the information required by Section 63.71(a)(1) – (a)(4) as well as the statement applicable to non-dominant carriers in Section 63.71(a)(5)(i) (see Attachment 1). The notice also instructed Kiskitel’s wholesale distributors to post the notice at the location where they sell Kiskitel’s calling cards. Finally, the notice included the following statement: “Kiskitel has recorded an automated audio message on its long-distance access code number to notify users of the discontinuance of Kiskitel’s service. That message will advise users that Kiskitel is discontinuing service on January 31, 2010; that after that date, calls placed using Kiskitel’s access number will no longer be completed; and that if they have any questions, they should contact our customer service department at 1-877-675-7255. Relevant information is posted online at www.kiskitel.com.”

III. Notice to States and Department of Defense

In accordance with Section 63.71(a), Kiskitel has mailed a copy of this Application to the Governor’s Offices and public utility commissions in Kansas, Florida and Texas, and to the Secretary of Defense.

IV. Non-Dominant Status

Kiskitel is a non-dominant carrier in the domestic and international telecommunications market.

⁴ Kiskitel’s cards are not renewable. Once funds are depleted, the customer must purchase a new card if he or she wants to continue service. In addition, each Kiskitel card states that it becomes invalid after six months or one year, depending upon the type of card purchased by the customer.

V. Designated Contacts

Correspondence concerning this Application should be directed to:

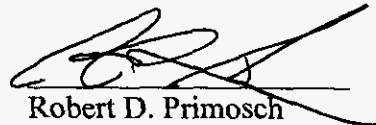
Robert D. Primosch
Wilkinson Barker Knauer, LLP
Suite 700
2300 N Street, N.W.
Washington, D.C. 20037
202.783.4141
rprimosch@wbklaw.com

WHEREFORE, Kiskiminetas Communications LLC respectfully requests that the Commission authorize the discontinuance of its resold domestic and international telecommunications service described above on or after January 31, 2011, or 31 days after the Commission releases public notice of this filing, whichever date is later.

Respectfully submitted,

KISKIMINETAS COMMUNICATIONS LLC

By:



Robert D. Primosch
Robert G. Morse

Wilkinson Barker Knauer, LLP
2300 N Street, NW, Suite 700
Washington, DC 20037
202.783.4141

Its Attorneys

January 6, 2011

CERTIFICATE OF SERVICE

I, Jennifer L. Canose, hereby certify that the foregoing Section 63.71 Application was served this 6th day of January, 2011, by depositing a true copy thereof with the United States Postal Service, first class postage prepaid, addressed to the following:

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

The Honorable Rick Scott
Office of the Governor
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

The Honorable Mark Parkinson
Office of the Governor
Capitol, 300 SW 10th Ave., Ste. 241S
Topeka, KS 66612-1590

Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

The Honorable Rick Perry
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

Secretary of Defense
Attn: Special Asst. for Telecommunications
Pentagon
Washington, DC 20301

/s/ Jennifer L. Canose
Jennifer L. Canose

Attachment 1



Kiskiminetas Communications, LLC
2819 NW Loop 410
San Antonio, TX 78230

January 3, 2010

Mr. Rehan Rajab
Touch Telecom, LLC
2718 Rio Guadalupe
San Antonio, TX 78259

Re: Notice of Discontinuance of Service

Dear Mr. Rajab:

As required by the rules of the Federal Communications Commission, we are writing to advise you that Kiskiminetas Communications LLC ("Kiskitel") will be terminating operations and thus is discontinuing its prepaid domestic and international long distance service (and the calling cards used to provide that service) on January 31, 2011, or upon regulatory approval, whichever is later. The discontinuance will apply to all areas domestically and internationally where Kiski's calling cards may be used. Also, KiskiTel hereby notifies you that it is terminating that certain Prepaid Wireless PIN Distribution Agreement signed November 23, 2009 between our companies effective January 12, 2011.

Because providing direct written notice to each user of Kiskitel's service is impossible, Kiskitel has recorded an automated audio message on its long-distance access code number to notify users of the discontinuance of Kiskitel's service. That message will advise users that Kiskitel is discontinuing service on January 31, 2011 or upon regulatory approval, whichever is later; that after that date, calls placed using Kiskitel's access number will no longer be completed; and that if they have any questions, they should contact our customer service department at 1-877-675-7255. Relevant information is posted online at www.kiskitel.com.

Please post this letter where you have distributed our cards, and should you be contacted directly by any user with regard to Kiskitel's discontinuance of service, please advise him or her as follows:

“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 as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Kiskiminetas Communications LLC. 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.”

Please contact us if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Posner".

Paul M. Posner
President



Kiskiminetas Communications, LLC
2819 NW Loop 410
San Antonio, TX 78230

January 3, 2010

Mr. Alan Hau
ENT, LLC
3500 N. Rock Road, Bldg 1000
Wichita, KS 67226

Re: Notice of Discontinuance of Service

Dear Mr. Hau:

As required by the rules of the Federal Communications Commission, we are writing to advise you that Kiskiminetas Communications LLC ("Kiskitel") will be terminating operations and thus is discontinuing its prepaid domestic and international long distance service (and the calling cards used to provide that service) on January 31, 2011, or upon regulatory approval, whichever is later. The discontinuance will apply to all areas domestically and internationally where Kiski's calling cards may be used. Also, KiskiTel hereby notifies you that it is terminating that certain Prepaid Wireless PIN Distribution Agreement dated January 26, 2010 between our companies effective January 12, 2011 pursuant to Section 4 of that Agreement.

Because providing direct written notice to each user of Kiskitel's service is impossible, Kiskitel has recorded an automated audio message on its long-distance access code number to notify users of the discontinuance of Kiskitel's service. That message will advise users that Kiskitel is discontinuing service on January 31, 2011 or upon regulatory approval, whichever is later; that after that date, calls placed using Kiskitel's access number will no longer be completed; and that if they have any questions, they should contact our customer service department at 1-877-675-7255. Relevant information is posted online at www.kiskitel.com.

Please post this letter where you have distributed our cards, and should you be contacted directly by any user with regard to Kiskitel's discontinuance of service, please advise him or her as follows:

“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 as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Kiskiminetas Communications LLC. 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.”

Please contact us if you have any questions.

Very truly yours,

A handwritten signature in black ink that reads "Paul Posner". The signature is written in a cursive, slightly slanted style.

Paul M. Posner
President



Kiskiminetas Communications, LLC
2819 NW Loop 410
San Antonio, TX 78230

January 3, 2010

Mr. Rick Estrada
Krush Communications
1064 E Brandon Blvd Suite A
Brandon, FL 33511

Re: Notice of Discontinuance of Service

Dear Mr. Estrada:

As required by the rules of the Federal Communications Commission, we are writing to advise you that Kiskiminetas Communications LLC ("Kiskitel") will be terminating operations and thus is discontinuing its prepaid domestic and international long distance service (and the calling cards used to provide that service) on January 31, 2011, or upon regulatory approval, whichever is later. The discontinuance will apply to all areas domestically and internationally where Kiski's calling cards may be used. Also, KiskiTel hereby notifies you that it is terminating that certain Prepaid Wireless PIN Distribution Agreement dated January 29, 2010 between our companies effective January 12, 2011 pursuant to Section 4 of that Agreement.

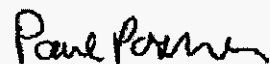
Because providing direct written notice to each user of Kiskitel's service is impossible, Kiskitel has recorded an automated audio message on its long-distance access code number to notify users of the discontinuance of Kiskitel's service. That message will advise users that Kiskitel is discontinuing service on January 31, 2011 or upon regulatory approval, whichever is later; that after that date, calls placed using Kiskitel's access number will no longer be completed; and that if they have any questions, they should contact our customer service department at 1-877-675-7255. Relevant information is posted online at www.kiskitel.com.

Please post this letter where you have distributed our cards, and should you be contacted directly by any user with regard to Kiskitel's discontinuance of service, please advise him or her as follows:

“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 as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Kiskiminetas Communications LLC. 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.”

Please contact us if you have any questions.

Very truly yours,

A handwritten signature in black ink that reads "Paul Posner". The signature is written in a cursive, slightly slanted style.

Paul M. Posner
President