

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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COMMISSION CLERK
KLC

DATE: April 17, 2012
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Kiwanis L. Curry, Regulatory Analyst III, Division of Regulatory Analysis
RE: Docket No. 110315-TX

Please add the attached to the docket file.

DOCUMENT NUMBER DATE
02347 APR 17 2012
FPSC-COMMISSION CLERK



12 FEB 27 PM 3:37

February 24, 2012
Via Overnight Delivery

DIVISION OF
REGULATORY COMPLIANCE

Ms. Beth Salak, Director, Regulatory Analysis
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: **Docket Number 110315-TX**
Application of **Unity III Telecom, LLC** for Authority to Provide Competitive Local Exchange Services within the State of Florida

Dear Ms. Salak:

Enclosed please find the response to the data request issued in the above-referenced docket number submitted on behalf of Unity III Telecom, LLC.

1. Please provide a list of each owner, corporate officer and managing member of Unity III Telecom, LLC (Unity) and explain what each person's responsibilities will be for the new applicant.

Amvensys Capital Group, LLC is the Sole Managing Member of Unity, and has vested all management powers and authority for Unity with its corporate officers.

Charles L. Schneider, Jr. is Chief Executive Officer and President for Unity
Charles M. Hartley is Vice President of Operations for Unity
Susan Do is Corporate Secretary for Unity

2. Are any of the owners, corporate officers, or managing members of Unity also owners, corporate officers or managing members of other companies that provide voice communications service? If so, list the Companies.

Amvensys Capital Group, LLC is the Sole Member of dPi Teleconnect, LLC, TAG Mobile, LLC and ACG Telecom, LLC, which is the Sole Member of Voicecom Telecommunications, LLC d/b/a Intelliverse ("Intelliverse"), in addition to Unity. dPi Teleconnect, LLC, Intelliverse and TAG Mobile, LLC are all providers of voice communications services. (Please refer to Attachment B provided in response to question #8 below.)

Charles L. Schneider, Jr. is President and CEO of dPi Teleconnect, LLC
Charles M. Hartley is Vice President of Operations for dPi Teleconnect, LLC
Susan Do is Corporate Secretary for Amvensys Capital Group, LLC, ACG Telecom, LLC, dPi Teleconnect, LLC, TAG Mobile, LLC and Intelliverse.

Other than Mr. Schneider and Mr. Hartley, who hold corporate officer positions with both Unity and dPi Teleconnect, LLC, and Ms. Do, who holds the Corporate Secretary office for the parent and all subsidiaries, the Amvensys Capital Group, LLC subsidiaries which provide voice communications services do not share any other corporate officers or executive management.

DOCUMENT NUMBER DATE

RE: **Docket Number 110315-TX**
Application of **Unity III, Telecom, LLC** for Authority to Provide Competitive Local Exchange Services within the State of Florida

3. Have any Unity owners, corporate officers or managing members been charged or convicted of a criminal offence? If so, please provide details as to who, when, and where the charges or convictions occurred.

No.

4. Have any Unity owners, officers or managing members been involved in any civil litigation in which a Unity owner, officer, or managing member has been deposed or has been a plaintiff, a defendant, or a witness in their capacity as an officer, manager, or managing member of a voice communications provider? If so, please provide details as to who, when and where the civil litigation occurred.

No.

5. Question 17(b) of the CLEC application asks if any of the officers, directors, or any of the ten largest stockholders have been previously granted or denied a competitive local exchange certificate in the State of Florida (this includes active and canceled competitive local exchange certificates). If yes, provide explanation and list the certificate holder and certificate number. Unity answered no.

No.

The Application lists Charles Schneider as President & CEO of Unity. The Florida PSC's Master Commission Directory currently list Charles Schneider as dPi Teleconnect's Senior Vice President of compliance and Regulation.

The application also lists Chuck Hartley as Vice President of Operations for Unity. The FCC form 499 filing database as of 10/5/11, shows Chuck Hartley as an officer of dPi Teleconnect.

The Managerial Profiles included in the application for each of these persons does not include any mention of dPi Teleconnect in their history, yet Unity's application in North Carolina identifies dPi Teleconnect, LLC as a Unity affiliate. Please explain these discrepancies.

At the time the application was created, TMI was working at finalizing the regulatory certification status of TAG Mobile and dPi Teleconnect companies. This application was inadvertently not updated once the list was complete. Resumes were not finalized prior to filing the application as well. A new set of resumes is attached as Attachment A showing the relationship between the officers and all companies.

RE: **Docket Number 110315-TX**
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- 6) Question 17(c) of the CLEC application asks if any of the officers, directors, or any of the ten largest stockholders have previously been an officer, director, partner or stockholder in any other Florida certificated or registered telephone company. If yes, give name of company and relationship. If no longer associated with company, give reason why not. Unity answered "Yes" - Tag Mobile, LLC.

The Application lists Charles Schneider as President & CEO of Unity. The Florida PSC Master Commission Directory currently lists Charles Schneider as dPi Teleconnect's Senior Vice President of Compliance Regulation.

The Application also lists Chuck Hartley as Vice President of Operations for Unity. The FCC form 499 filing database as of 10/5/11 shows Chuck Hartley as an officer of dPi Teleconnect, LLC as a Unity affiliate. Please explain these discrepancies.

See response for Question #5 above regarding the discrepancies between the applications.

- 7) Please provide the physical location where Unity III Telecom, LLC will be keeping its books and records.

All books and records of the company will be kept at the main office location for Unity at 1330 Capital Parkway, Carrollton, TX 75006.

- 8) Unity's North Carolina Application for a Certificate of Public Convenience and Necessity to Offer Local Exchange and Exchange Access Telecommunications Service as a Competing Local Provider (North Carolina Application) states that Unity will not have managers and management of the company is reserved to the members. It names governing person as Amvensys Capital Group, LLC. Please provide an organization chart for Unity and Amvensys Capital Group, LLC.

Attachment B contains an overall organizational chart for the entities under Amvensys Capital Group, LLC as well as an organizational chart showing the key management individuals.

- 9) Would Amvensys Capital Group, LLC be the governing "person" for Unity in Florida?

Yes, Amvensys Capital Group, LLC is the governing "person" for Unity in Florida.

RE: **Docket Number 110315-TX**
Application of **Unity III, Telecom, LLC** for Authority to Provide Competitive Local Exchange Services within the State of Florida

- 10) Unity's North Carolina application states that Charles Schneider and Z. Ed Lateef should be deleted as managers along with their addresses. Please explain the reasoning.

At the time the application was created, TMI was working at finalizing the regulatory certification status of the TAG Mobile and dPi Teleconnect companies as well as the officers/key management lists. As Unity is Member Managed by its sole Member, Amvensys Capital Group, LLC, there are no Managers for Unity. As such, Messer's Lateef and Schneider should not have been included as Managers in the North Carolina application.

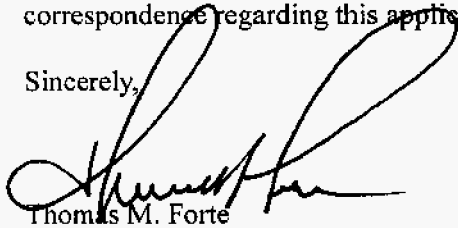
- 11) The financial statements provided with the Application appear to show that financing for Unity will be coming from other sources. Please identify these sources and explain the terms of the financing between Unity and these sources.

All financing for Unity will be coming from its ultimate parent company, Amvensys Capital Group, LLC.

Please acknowledge receipt of this filing by returning, filed stamped, the extra copy of this letter in the self-addressed stamped envelope.

I may be reached at (407) 740-3001 or via email at tforte@tminc.com with any questions, comments or correspondence regarding this application. Thank you for your assistance.

Sincerely,



Thomas M. Forte
Consultant to Unity III Telecom, LLC

cc: Melanie King (Email only) - Unity III
file: Unity III - Florida - Local
tms: FL11100b

Attachments
TF/mw

ATTACHMENT A

UNITY III TELECOM, LLC

Management Profiles

Chuck Schneider, President & CEO for Unity Telecom, has over 25 years of telecommunications experience. He is responsible for strategic direction, new product offerings, new market and new technologies.

Prior to Unity Telecom, Mr. Schneider owned and operated Genesis Consulting Group, specializing in network planning, engineering, provisioning, cost and revenue optimization. Previous to Genesis, Mr. Schneider was Vice President, Business Operations at CMC Telecom. At CMC he was responsible for overseeing network operations, engineering, regulatory affairs, billing, IT, provisioning, customer care, and finance. His major accomplishment at CMC was taking the Company to the next level by transforming the telecom provider from being a Reseller to a facility-based carrier by installing a state-of-the-art Alcatel-Lucent and BroadSoft VoIP soft switch platform & 10 collocation facilities.

Prior to joining CMC Telecom, Mr. Schneider was the Director, Business Development at BullsEye Telecom, where he orchestrated the launch of voice services in 42 states.

Mr. Schneider began his career at Allnet/Frontier Communications shortly after the merger with Lexitel Corporation in 1985 where he held positions in customer service, network provisioning, network planning and carrier relations. Most notable accomplishments include the planning and implementation of several network cost cutting projects & switch consolidations at Allnet/Frontier that improved the Company's bottom line which were instrumental in the turnaround of the Company.

Mr. Schneider holds a Bachelor of Business Administration degree from The University of Michigan.

Chuck Hartley, Vice President of Operations for Unity Telecom, has over 27 years of telecommunications experience. He is responsible for the provisioning department, network design & architecture, vendor relations, network engineering, optimization & financial assurance for the Company.

Prior to Unity Telecom, Mr. Hartley was the Director of Network Operations at Norlight, Inc. His responsibilities included the full integration of new and existing platforms into the network which encompassed project management, product development, engineering, and training. Mr. Hartley was a key contributor in taking the company from losing \$1.7mil/mo to positive EBITDA. He also held positions at e-Tel, Sigecom and KDL/LDM in various Senior Management capacities directing the network and operations.

Mr. Hartley began his career in the United States Air Force. In the Air Force he supervised personnel during the day-to-day maintenance and translations of numerous switching platforms.

Susan Do, Secretary - Ms. Do currently serves as Associate Counsel of Amvensys Capital Group, LLC. Her in-house experience includes contract review and negotiation, M&A, employment and labor, and maintenance of intellectual property in the telecommunications and pharmaceutical industries. Prior to her legal career, she also held a position as Deputy Director of a non-profit organization catered to hurricane rebuilding efforts in New Orleans, where her duties included grant writing, managing media relations, and administering the day-to-day operations of the organization. Ms. Do holds a BA in Communications from Loyola University New Orleans and a JD from Loyola University New Orleans College of Law. She is a member of the Texas bar.

ATTACHMENT B

UNITY III TELECOM, LLC

Parent Company Organizational Chart

Legal Structure

Amvensys

AMVENSYS HOLDING CORPORATION

