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DOCKET NO. 20190059-TX

FILED 3/11/2019

DOCUMENT NO. 03014-2019

FPSC - COMMISSION CLERK

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March 11, 2019

Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Global Connection Inc. of America (TX 563) Notice of Service Discontinuance;
Request to Cancel its CLEC Authority and Associated Price List and to
Relinquish its Wireline Eligible Telecommunications Carrier Designation

Dear Mr. Teitzman:

Global Connection Inc. of America (Global or the Company) respectfully submits this filing to notify the Florida Public Service Commission (Commission) of its intention to discontinue provision of wireline local exchange telecommunications services in Florida beginning on April 16, 2019. The effect of this discontinuance upon the Florida competitive telecommunications market will be minimal, as the Company currently provides wireline services to twenty-three or fewer customers in the State and these customers have a number of alternative choices for service providers.

In connection with its decision to discontinue provision of intrastate wireline services in Florida, Global respectfully requests that as soon as practicable after May 14, 2019, the Commission (i) cancel Global's local exchange certificate and price list and (ii) approve the Company's relinquishment of its wireline Eligible Telecommunications Carrier (ETC) designation. In support of this request, Global provides the following information:

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I. Discontinuance of Wireline Services: Request for Cancellation of Global's CLEC Certificate and Price List

The Commission granted Global authority to provide competitive intrastate wireline telecommunications services in Florida on June 28, 2001 in Docket No. 010152-TX.¹ At this time, Global has no more than twenty-three (23) customers in Florida for its wireline services. After extensive assessment of the market, Global has determined that its strategic business plans in Florida do not include the continued provision of wireline telecommunications services.²

Between February 25-27, 2019, Global sent written notice by first-class mail, to all affected customers in Florida, notifying them that the Company will cease providing the prepaid wireline local exchange and interexchange services they currently receive.^{3,4} As a result, these subscribers have received at least forty-five (45) days' notice of the proposed discontinuance. A copy of the notice form sent to Florida subscribers is attached. The notice complies with Federal Communications Commission (FCC) Rule 64.1120(e) and underscores to the subscriber the need to make arrangements with another provider in a timely manner. A toll-free customer service number for the Company is provided so that subscribers may seek assistance from Global personnel while making these arrangements.

Following completion of the discontinuance process, Global does not intend to provide wireline services in Florida. Accordingly, pursuant to Fl. Stat. § 364.335(3), the Company

¹ Global also operates in Florida as a provider of commercial mobile radio services (CMRS) under the d/b/a Stand Up Wireless. **This filing solely addresses Global's wireline services. The Company will continue to provide CMRS in Florida.**

² Global is also discontinuing provision of interstate wireline services to Florida customers and has made the appropriate filing with the Federal Communications Commission. Pursuant to 47 C.F.R. § 63.71(a), the Commission has been served with a copy of the Company's application for discontinuance of interstate wireline service.

³ Except as explained, below, in n. 4, the discontinuances are scheduled to occur on dates beginning with April 16, 2019 and concluding on May 13, 2019. The Company intends to time the discontinuances to align with the end of each customer's prepaid monthly service period. Each customer has been sent a notice identifying the specific date on which his or her discontinuance is scheduled.

⁴ Three of the Company's wireline services customers receive federal Lifeline discounts in connection with Global's service. Pursuant to discussion with Commission Staff, these customers' services will not be discontinued until the matter of Global's ETC relinquishment is resolved.

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respectfully requests that the Commission cancel its wireline authority and associated price list on or after May 14, 2019.⁵

II. Relinquishment of ETC Designation

The Commission designated Global as an ETC for provision of wireline low-income (Lifeline-supported) services in certain BellSouth Telecommunications, Inc. d/b/a AT&T Florida, Embarq-Florida, Inc., Verizon Florida and Windstream exchanges on September 15, 2011 in Docket No. 20090514-TX.⁶ In connection with its exit from the wireline sector, Global respectfully requests to relinquish its designation. The Communications Act of 1934, as amended, and FCC Rule 54.205 provide that an ETC designated in an area served by more than one ETC shall be permitted to relinquish its designation. At this time, there are a number of other ETCs serving within Global's designated area, including Frontier, Windstream, CenturyLink Embarq, Knology, SafeLink Wireless, Assurance Wireless, T-Mobile and other wireless ETCs. Accordingly, Global's request to relinquish its designation should be approved.

* * * * *

Please contact me at (202) 945-6649 or via email at wbrantl@kelleydrye.com if you have any questions concerning this matter. Thank you for your assistance with this request.

Respectfully submitted



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Counsel for Global Connection Inc. of America

⁵ Global is current with all Regulatory Assessment Fees due to the Commission.

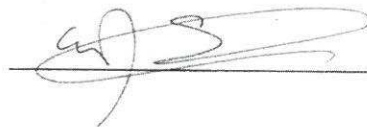
⁶ The Universal Service Administrative Company assigned study area code 219016 to Global for its provision of wireline Lifeline services in Florida. The Company will contact USAC to have this study area code cancelled in connection with this relinquishment.

VERIFICATION

STATE OF GEORGIA §
 §
COUNTY OF GWINNET §

I, Eric Schimpf, state that I am the Chief Operating Officer of Global Connection Inc. of America (Global Connection); that I am authorized to make this Verification on behalf of Global Connection; that I have read the foregoing document; and that the statements in the foregoing document, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.



Subscribed and sworn to before me this 11th day of March, 2019.

Notary Public 

My Commission expires: April 3, 2020



Sample Customer Notice



5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



February 25, 2019

[Customer Name]
[Customer Address]
[City, State Zip]

Notice of Discontinuance of Your Telephone Service by Global Connection Inc. of America

Dear Global Connection Customer:

We regret to inform you that we are preparing to discontinue the provision of wireline local and long distance telephone services in [State]. As a result, subject to receipt of required regulatory approvals, your Global Connection Real Home Phone service will be discontinued on or shortly after [DATE].

In order to avoid a disruption in telephone service, you must make arrangements to receive service from a new telephone company before [DATE]. Please note, you will have one or more service renewal dates, the last being on [DATE]. If you continue to renew your service by those renewal dates, you will continue to have telephone service until your Last Service Date of [DATE].

As always, you may choose not to renew your service on or by your upcoming renewal date(s) and instead terminate your service at that time.

If your account is set up for Automatic Renewal, the service will be renewed on [DATE], unless you contact the Call Center at the number below.

If you do not arrange to have your telephone service provided by a new telephone company prior to your Last Service Date, you will lose telephone service (which means that you will be unable to make local calls including 911) and you may not be able to keep your current telephone number(s) with the new service provider. We urge you not to delay in arranging for a new service provider, as some carriers may require several weeks to install new services. To help avoid any lapse in your service, please check carefully that all services you currently receive from Global Connection, including both local and long distance services, are moved to your new carrier.

The names and telephone numbers of local telephone service companies, which also typically provide long distance service, should be listed in your telephone directory. Customer service representatives at these companies will help you to select services to most effectively replace your current Global Connection service. We also enclose a list of providers that may be operating in your area. If you arrange for new service before your Global Connection service is



5555 Oakbrook Parkway
Suite 620
Norcross, GA 30093



terminated and wish to keep your current telephone number(s), please be sure to address this with your new service provider.

Global Connections offers prepaid wireless service under the brand StandUp Wireless. You have the option of selecting an Unlimited Talk, Unlimited Text and 1 Gigabyte of Mobile data for Twenty dollars per month. The plan includes long distance calling, voicemail and standard features for a significant discount to your current landline service. If you would like to purchase this option as an alternative to your landline service, or have questions please call us at 800-551-7993

The Federal Communications Commission requires us to provide you with the following notice in connection with its review of the proposed discontinuance:

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. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may 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 Global Connection Inc. of America. 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.

We thank you for being a Global Connection customer and remain committed to making your service transition as smooth as possible. If you have any further questions regarding the discontinuance of our services in [State], please contact Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America