

May 25, 2022

VIA ELECTRONIC FILING

Florida Public Service Commission
Telecommunications Division
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Request for Cancellation of CPCN
ComNet (USA) LLC (TX728)
100 North Barranca Street, Suite 910, West Covina, CA 91791

Dear Telecommunications Division Staff:

On behalf of ComNet (USA) LLC (“ComNet”), I am filing this request to cancel ComNet’s Certificate of Public Convenience and Necessity (“CPCN”) TX728 to provide telecommunications services in Florida, which was granted by the Commission on August 28, 2003 in Docket No. 20030521.

ComNet is surrendering its CPCN because, on March 23, 2022, the Federal Communications Commission (“FCC”) released an order revoking ComNet’s domestic Section 214 authority, and revoking and terminating ComNet’s international Section 214 Authority. *Pacific Networks Corp. and ComNet (USA) LLC, Order on Revocation and Termination, GN Docket No. 20-111, ITC-214-20090105-00006, ITC-214-20090424-00199 (rel. Mar. 23, 2022) (“Order”)*. As a result, ComNet was required to stop providing telecommunications services in the United States on May 23, 2022.

Prior to that date, ComNet provided prepaid calling card services. On April 22, 2022, ComNet provided its calling card customers 30 days’ advance notice of the discontinuance, both through direct emails and also through a recorded message that will play when customers dial the access number for the service. Given the nature of calling card services, ComNet lacks a known address for many customers, and as such the FCC specifically authorized ComNet to provide both written and recorded notice. *Order* at ¶ 158 n.833. These notices are attached hereto as Attachment A. ComNet also posted notice of service termination on its website, and the FCC provided notice on its own website on March 25, 2022 by posting a consumer guide advising of the termination. Effectively, then, customers had notice that ComNet would cease providing prepaid calling card services for almost two months. The



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ComNet notices advise customers of a process to obtain a refund of unspent amounts remaining on calling cards after May 23.

Please direct communications related to this letter to me by phone at 202-2563-6838, email at jcarlisle@lermansenter.com, or mail at Lerman Senter PLLC, 2001 L Street, NW, Suite 400, Washington, DC 20036.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jeffrey J. Carlisle
Jeffrey J. Carlisle
Counsel for ComNet (USA) LLC

Attachment A

Email and Recorded Notices to Calling Card Customers

From: support@comnet-telecom.com

To: customer's email address

Subject: Service Termination Notice

Dear Customers,

This email is to inform you that ComNet (USA) LLC ("ComNet") will cease providing Calling Card Service (which are Prepaid Calling Card and Easycall Pinless Service) in the U.S. at 00:00 May 23, 2022 EST (the "Termination Date"). In compliance with FCC's order, we are certifying that we are providing our customers the required advance notice in writing.

ComNet will continue to provide service for existing customers with valid value remaining in their accounts until the Termination Date. No Calling Card Service will be provided after 23:59 May 22, 2022 EST.

Unless ComNet announces otherwise, in no event will ComNet provide the Calling Card Service to customers since the Termination Date. Customers are strongly advised to use up as much of their valid value as possible before the Termination Date.

For a Prepaid Calling Card (1) purchased on or after April 22, 2020 EST or (2) purchased before April 22, 2020 EST and that has a calling record between April 22, 2020 EST and April 22, 2022 EST, any valid value, with at least USD 1.00 or more, remaining in the account will be refunded following ComNet's review to confirm the claim is valid and that the request was made within 30 days after the Termination Date (which is 00:00 May 23, 2022 EST – 23:59 June 21, EST).

For Easycall Pinless Service (1) purchased on or after October 24, 2021 EST or (2) purchased before October 24, 2021 EST and has been first used before April, 22, 2022 EST, any valid value, with at least USD 1.00 or more, remaining in the account will be refunded following ComNet's review to confirm the claim is valid and that the request was made within 30 days after the Termination Date (which is 00:00 May 23, 2022 EST – 23:59 June 21, EST).

For more details, please visit ComNet's website <https://www.comnet-telecom.us/>.

ComNet has been honored to count you as a valued customer of our Calling Card Service. Prior to our discontinuance, we will continue to provide high-quality service to you under the same terms and conditions. We sincerely apologize for any inconvenience caused as a result of this action.

Please feel free to contact us at 1-800-660-9405 if you have any further questions.

Thank you.

ComNet (USA) LLC Team

The logo for ComNet, featuring the word "ComNet" in a bold, blue, sans-serif font.

Tel.: 1-800-660-9405

Email: support@comnet-telecom.com

From: support@comnet-telecom.com

To: customer's email address

主題：服務終止通知

尊敬的客戶：

此郵件為正式通知閣下，ComNet (USA) LLC (下稱“ComNet”) 將於美國東部時間 2022 年 5 月 23 日 00:00 (“服務終止日”) 起停止在美國境內提供電話卡服務 (即預付電話卡及 Easycall 無碼服務)。鑒於美國聯邦通信管理局近期發出的指令，要求本公司向客戶提早發出服務終止的通知，ComNet 特此通知閣下。

現有客戶如帳戶中仍存有有效餘額，將可繼續使用服務直到服務終止日。美國東部時間 2022 年 5 月 22 日 23:59 分後系統將停止提供該服務。

除非 ComNet 另有宣布外，否則在服務終止日起，ComNet 將不再提供電話卡服務。我們強烈建議閣下於服務終止日前盡量用完帳戶內之餘額。

如閣下所持有的預付電話卡 (1) 於美國東部時間 2020 年 4 月 22 日或之後購買；或 (2) 於美國東部時間 2020 年 4 月 22 日之前購買，且於美國東部時間 2020 年 4 月 22 日至 2022 年 4 月 22 日期間曾有通話紀錄，則如閣下於服務終止日前，帳戶中仍存有至少 1 美元或以上有效餘額，並於服務終止日後 30 日內 (即美國東部時間 2022 年 5 月 23 日 00:00 至 2022 年 6 月 21 日 23:59) 提出退款要求，經 ComNet 審查以確認退款申請有效後，餘額將會退還給閣下。

如閣下所持有的 Easycall 無碼服務 (1) 於美國東部時間 2021 年 10 月 24 日或之後購買；或 (2) 於美國東部時間 2021 年 10 月 24 日之前購買，且在美國東部時間 2022 年 4 月 22 日前首次使用，則如閣下於服務終止日前，帳戶中仍存有至少 1 美元或以上有效餘額，並於服務終止日後 30 日內 (即美國東部時間 2022 年 5 月 23 日 00:00 至 2022 年 6 月 21 日 23:59) 提出退款要求，經 ComNet 審查以確認退款申請有效後，餘額將會退還給閣下。

更多詳情請參閱 ComNet 網站 <https://www.comnet-telecom.us/>。

ComNet 很榮幸能成為閣下電話卡服務的供應商。在服務終止前，ComNet 將在既有的條款和細則下，繼續為客戶提供高質量的服務。對因服務終止給閣下造成的任何不便，我司深表歉意，並感謝閣下支持及體諒。

如有其他疑問，請隨時致電 1-800-660-9405 與客戶服務部聯絡。

謝謝!

ComNet (USA) LLC Team

ComNet

Tel.: 1-800-660-9405

Email: support@comnet-telecom.com

IVR MESSAGE ABOUT LONG DISTANCE CALLING SERVICE TERMINATION

Background:

Pursuant to an FCC ruling, ComNet (US) LLC (“ComNet”) will be exiting Calling Card Service (both prepay calling card & easycall pinless) business in the U.S.. ComNet will no longer provide Calling Card Service to customers after 00:00 May 23, 2022 (the “Termination Date”). Below IVR voice prompt message serves as an advance notice to our service end user about such arrangement.

Logic:

End User dials into our local access/800 access number and follows the IVR to make calls. Hence on 00:00 April 23, 2022, ComNet will upload below IVR Prompt up message to the system, so that all end user will be able to hear such service termination announcement.

IVRS Voice Prompt Content:

Dear Valued Customer,

Pursuant to a recent FCC ruling, ComNet (USA) LLC will cease providing calling card service within the U.S. at 00:00 May 23, 2022 EST (the “Termination Date”).

We will continue to provide you with the existing service until the Termination Date. No calling card service will be provided after 23:59 May 22, 2022 EST.

ComNet would like to thank you for your continued support and apologize for any inconvenience caused.

For all inquiries, including requests for refund of unspent amounts, please contact our customer service hotline 1-800-660-9405 or visit our website <http://comnet-telecom.us>.

CANTONESE

尊敬的客戶,

因應美國聯邦通信委員會近期發出的指令，ComNet (USA) LLC 將於美國東部時間 2022 年 5 月 23 日 00:00 (“服務終止日”) 起停止在美國境內提供電話卡服務。您可繼續正常使用現有服務至服務終止日。美國東部時間 2022 年 5 月 22 日 23:59 分後系統將停止提供該服務。

ComNet 非常感謝閣下一直以來的支持。對因服務停止而給閣下造成的任何不便，深表歉意。

如有任何疑問，包括退款申請，歡迎致電我們的服務熱線：1-800-660-9405 或瀏覽我們的網站 <http://comnet-telecom.us>。

Mandarin

尊敬的客戶，

因應美國聯邦通信委員會近期發出的指令，ComNet (USA) LLC 將於美國東部時間 2022 年 5 月 23 日 00:00（“服務終止日”）起停止在美國境內提供電話卡服務。您可繼續正常使用現有服務至服務終止日。美國東部時間 2022 年 5 月 22 日 23:59 分後系統將停止提供該服務。

ComNet 非常感謝閣下一直以來的支持。對因服務停止而給閣下造成的任何不便，深表歉意。

如有任何疑問，包括退款申請，歡迎致電我們的服務熱線：1-800-660-9405 或瀏覽我們的網站 <http://comnet-telecom.us>。

IVRS Voice Prompt Duration:

ENGLISH: Around - 1min 20 sec

CHINESE (Mandarin / Cantonese): Around - 1min 10 sec