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June 29, 2017

VIA OVERNIGHT DELIVERY
AND E-MAIL TO jeffd.cline@ky.gov

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602
502-564-3940

RECEIVED

JUN 30 2017

**PUBLIC SERVICE
COMMISSION**

Re: Notification of Global Connection Inc. of America and Tele Circuit Network Corporation Regarding a Transfer of Customers

Dear Sir/Madam:

Global Connection Inc. of America (“Global Connection”) and Tele Circuit Network Corporation (“Tele Circuit,” collectively with Global Connection, the “Parties”) hereby notify the Kentucky Public Service Commission (the “Commission”) of their intention to transfer certain Global Connection retail wireline customers to Tele Circuit (the “Transaction”). For the Commission’s records, the Parties provide the following information:

I. THE PARTIES

A. Global Connection Inc. of America (“Global Connection”)

Global Connection is a Georgia corporation with its principal office located at 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Global Connection provides prepaid wireless telecommunications services under its d/b/a, Stand Up Wireless, in twenty-four (24) territories¹ and prepaid wireline local exchange and long distance services to residential customers in twenty (20) states.² Global Connection is designated as an eligible telecommunications carrier (ETC) to provide Lifeline services to low-income consumers on a wireline basis in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Michigan,

¹ Those twenty-four territories are: Arkansas, Arizona, California, Colorado, Georgia, Iowa, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota, Missouri, Nebraska, Ohio, Pennsylvania, Rhode Island, South Carolina, Texas, Utah, Wisconsin and West Virginia as well as Puerto Rico.

² Those twenty states are: Alabama, Arkansas, Colorado, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Missouri, Mississippi, North Carolina, Ohio, Oklahoma, South Carolina, Tennessee, Texas, and Wisconsin. Global Connection is also certified but not yet providing services in Minnesota, Nebraska, New Mexico, Oregon, Washington, and West Virginia.

Mississippi, North Carolina, South Carolina, Tennessee and Texas, and on a wireless basis in all twenty-four (24) of its wireless service territories. Global Connection currently serves wireline and wireless Lifeline subscribers pursuant to its ETC designations in a combined twenty-nine (29) jurisdictions. Global Connection is registered with the Commission to provide prepaid intrastate telecommunications services (Utility ID 5018100). Global Connection was designated by the Commission as an ETC to provide Lifeline services on a wireless basis on August 7, 2013 (Case No. 2013-00051), and on a wireline basis on January 6, 2017 (Case No. 2016-00363).

B. Tele Circuit Network Corporation (“Tele Circuit”)

Tele Circuit, a Georgia corporation, is headquartered at 1815 Satellite Blvd., Suite 504, Duluth, Georgia 30097. Tele Circuit is authorized to provide interexchange and/or competitive local exchange services in fifteen (15) states,³ and has been designated as an ETC to provide wireline Lifeline services in five (5) states.⁴ Tele Circuit is registered with the Commission to provide competitive local exchange (Utility ID 5054910) and interexchange telecommunications services (Utility ID 5179700).

II. DESIGNATED CONTACTS

Correspondence or other materials concerning this Notification should be directed to:

Lance J.M. Steinhart
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With a copy to:

Dee DiCicco, CCO
Global Connection Inc. of America
5555 Oakbrook Parkway, Suite 620
Norcross, Georgia 30093
Tel: (678) 741-6200
Email: ddicicco@gcioa.com

Ashar Syed, CEO
Tele Circuit Network Corporation
1815 Satellite Blvd., Suite 504
Duluth, Georgia 30097
Tel: (678) 818-1166
Email: ashar@telecircuit.com

³ Tele Circuit is designated as an IXC/CLEC in Alabama, California, Florida, Georgia, Kentucky, Louisiana, North Carolina, South Carolina, Tennessee, and Texas, and as an IXC in Maryland, Nevada, New Mexico, Pennsylvania, and Washington.

⁴ Tele Circuit is designated as a wireline ETC in Alabama, Florida, North Carolina, South Carolina, and Tennessee.

III. DESCRIPTION OF THE TRANSACTION

Pursuant to the terms of a Customer Purchase Agreement (the "Agreement"), Global Connection intends to transfer approximately 420 prepaid wireline customers in Kentucky to Tele Circuit. These Customers currently receive local exchange and interexchange services from Global Connection. After consummation, Tele Circuit will provide telecommunications services to the acquired Customers directly pursuant to its own telecommunications authorizations.⁵ Tele Circuit will not assume Global Connection's pre-closing liabilities or obligations, and Global Connection will retain its existing telecommunications authorizations.

The Transaction will not result in any loss or impairment of service for any customer. Tele Circuit will make any necessary revisions to its rates, terms, and conditions to incorporate Global Connection's current services and rates so that affected customers will continue to receive the same services that they currently receive without immediate changes to their service offerings or rates, and customers will not incur any costs associated with the Transaction. To ensure a seamless transition and avoid customer confusion or inconvenience, the Parties will be providing affected customers with notice prior to the transfer in accordance with applicable state and federal regulations, using a form notice substantially similar to the one attached hereto as Exhibit 1. Upon consummation of the Transaction and after completion of the customer transfer, Tele Circuit will provide Global Connection's customers with the same service quality they have come to expect and all billing will be handled under the Tele Circuit name.

IV. PUBLIC INTEREST ANALYSIS

The proposed Transaction is in the public interest. Upon consummation, Tele Circuit will provide the customers with the same high-quality competitive local exchange and interexchange services previously delivered by Global Connection. At the same time, the Transaction will enable Tele Circuit and Global Connection to more effectively pursue their respective business plans. This, in turn, will allow each company to compete more efficiently, to the ultimate benefit of consumers throughout their operating territories.

The Transaction will have no adverse effects for the transferred customers, who will receive notice in advance of the proposed transfer. Customers will continue to receive their existing services at the same rates as at present, and will be fully apprised of the impending change of carrier and may choose to remain with Tele Circuit or change to an alternate provider. Tele Circuit and Global Connection will further work together to ensure that the affected customers experience a smooth, virtually seamless, transition.

⁵ Approximately an additional 270 customers receive wireline Lifeline service from Global Connection in Kentucky. These customers will not be transferred until Tele Circuit applies for and is granted designation as an Eligible Telecommunications Carrier by the Commission, at which time separate notice would be provided to the affected Lifeline customers; in the interim, customers will continue to receive Lifeline service from Global Connection. Additionally, notice will be provided to the Commission upon Lifeline customer transfer.

V. CONCLUSION

The Parties respectfully request that the Commission note the Transaction for its records.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

Global Connection Inc. of America



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Its Counsel

EXHIBIT 1

Sample Customer Notice



IMPORTANT NOTICE

REGARDING A CHANGE TO YOUR TELECOMMUNICATIONS SERVICE

Dear Valued Customer,

Beginning on or around July 20, 2017,¹ your home telephone service, provided by Global Connection Inc. of America d/b/a Real Home Phone ("Global"), will be provided by Tele Circuit Network Corporation ("Tele Circuit"). **Please rest assured that the transition will have no impact on your current services or rates, nor will there be any interruption of service.**

No action on your part is required. You will continue to use your current telephone number while keeping the price you are paying for service the same. Tele Circuit will provide you with services that meet or exceed those you currently receive while ensuring that the transfer does not result in an increase to your regular monthly recurring charges. Notice of any future changes in rates, terms and conditions of service will be provided to you as required by law. Additionally, you will not incur any fees as part of this change and you can continue to make your monthly telephone payments at your neighborhood payment location.

You have the right to select a different provider, but please note that if you do, you may incur a fee from that provider for the transfer. If you do not switch your service to a different provider prior to July 20, 2017, then your phone service will automatically be transferred to Tele Circuit.

Please note that any local service preferred carrier "freeze" you have placed on your existing telephone lines to prevent unauthorized transfer to another local carrier will be over-riden for purposes of this transaction, and you will need to contact Tele Circuit, or your alternate provider, to request a new freeze after the transfer is complete.

Global would like to take this opportunity to express our gratitude for the many years of being able to provide home phone services. If you have any questions or concerns about your service or regarding the change to your home telephone account, you can call Global prior to the transfer at 1-877-511-3009. We will be happy to answer any questions you may have.

Tele Circuit is committed to the highest ideals of quality and unsurpassed customer service. If you are not satisfied with this transition in any manner, we encourage you to contact us so that we may resolve any outstanding questions you might have at 1-877-835-3247. If you have any complaints against Global prior to or during the transfer, you may also lodge such complaints with Tele Circuit at 1-877-835-3247.

Once again, thank you for your patronage and patience during this transition. We know that you will appreciate all the products and high quality of service you will receive from Tele Circuit.

Sincerely,

Global Connection Inc. of America
Customer Service: 1-877-511-3009

Tele Circuit Network Corporation
Customer Service: 1-877-835-3247

¹ Subject to any required regulatory approvals.