

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF GLOBAL CONNECTION)	
INC. OF AMERICA TO DISCONTINUE)	
REGULATED WIRELINE SERVICES AND)	CASE NO. 2019-00405
TO RELINQUISH ITS WIRELINE ELIGIBLE)	
TELECOMMUNICATIONS CARRIER)	
DESIGNATION)	

NOTICE - APPLICATION

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, Global Connection Inc. of America (“Global”) gives notice to the Kentucky Public Service Commission (“Commission”) of its intent to cease providing resold prepaid local exchange and interexchange services to residential customers in Kentucky and to relinquish its designation as a wireline Lifeline-only Eligible Telecommunications Carrier (“ETC”) on or about February 19, 2020, and applies for cancellation of its registration as an intrastate wireline telecommunications and its filed tariff and approval of its proposed relinquishment. The proposed relinquishment will have minimal impact because Global currently serves a limited number of subscribers, alternative service providers presently provide this service in Kentucky, and customers will have ample time to transition to another service provider.

In support of its Application, Global provides the following:

General Information

1. The full name and post office address of Global Connection Inc. of America is: 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. Its e-mail address is: eschimpf@gcioa.com.

2. Global is a corporation organized on June 1, 1998 under the laws of Georgia. It is presently in good standing in the state of Georgia and is authorized to transact business in the Commonwealth of Kentucky.

3. Copies of all orders, pleadings and other communications related to this proceeding should be directed to:

Eric Schimpf
Global Connection Inc. of America
5555 Oakbrook Parkway, Suite 620
Norcross, Georgia 30093
(678) 741-6245
eschimpf@gcioa.com

Winafred Brantl
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gerald.wuetcher@skofirm.com

4. Global is registered with the Commission as a competitive local exchange carrier. It presently has on file with the Commission a tariff that sets forth the descriptions, regulations, and rates applicable to its furnishing of services and facilities for alternative local exchange telecommunications service. The Commission designated Global as an ETC for the provision of wireline low income (Lifeline-supported) services throughout the operating territories of

incumbent carriers BellSouth Telecommunications, LLC d/b/a AT&T Kentucky, Windstream Kentucky East, LLC, and Windstream Kentucky West, LLC.¹

5. Global is also registered with the Commission as reseller of commercial mobile radio services and provides such services under the name of Stand Up Wireless. The Kentucky Public Service Commission designated Global as a wireless ETC in Case No. 2013-00051.²

6. **This Notice-Application does not address Global's provision of commercial mobile radio services or its designation to operate as a wireless ETC in Kentucky under the name of Stand Up Wireless.**

Discontinuance of Wireline Services

7. Global currently provides wireline services to a limited number of customers in the Commonwealth and these customers have an increasing number of alternative choices for service providers. After extensive assessment of the Kentucky market, Global has determined that its strategic business plans in Kentucky do not include the continued provision of wireline telecommunications service. Global intends to cease providing any wireline telecommunications services in Kentucky.³

8. On or about December 20, 2019, Global will send written notice by first-class mail to all affected customers in Kentucky that Global will cease providing the prepaid wireline local exchange and interexchange services. A copy of the notice form is attached to this Notice-Application as Exhibit A. This notice complies with Federal Communications Commission

¹ *Global Connection Inc. of America Petition for Designation as a Wireline Eligible Telecommunications Carrier in the State of Kentucky*, Case No. 2016-00363 (Ky. PSC Jan. 6, 2017).

² *Application of Global Connection Inc. of America d/b/a Stand Up Wireless for Designation as an Eligible Telecommunications Carrier in the State of Kentucky*, Case No. 2013-00051 (Ky. PSC Aug. 7, 2013).

³ Global is also discontinuing provision of interstate wireline services to Kentucky customers and will make the appropriate filing with the Federal Communications Commission concurrent with issuance of customer notices following approval of this application. Pursuant to 47 C.F.R. § 63.71(a), the Commission will be served with a copy of the Global's application for discontinuance of interstate wireline service.

(“FCC”) Regulations⁴ regarding the discontinuance of service 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. Global subscribers will receive at least sixty (60) days’ notice of the proposed discontinuance.

9. Global has scheduled discontinuances to begin on or about February 19, 2020. Discontinuances will be timed to align with the end of each customer’s prepaid monthly service period. Each customer will be sent a notice identifying the specific date on which his or her discontinuance is scheduled. The timing of discontinuances is contingent upon the FCC’s release of public notice of Global’s filing with the FCC and may be delayed if the FCC’s release of such public notice is delayed. Global will provide written notice to the Commission upon completion of discontinuance of service to its wireline customers in Kentucky.

10. Upon completion of the discontinuance process, Global will cease providing any wireline telecommunications services in Kentucky and its CLEC registration and its filed tariff for the provision of alternative local exchange telecommunications service should be cancelled.

Request to Relinquish ETC Designation

11. Global (SAC 269051) is designated as an ETC for the provision of wireline low income (Lifeline-supported) services throughout the operating territories of incumbent carriers BellSouth Telecommunications, LLC d/b/a AT&T Kentucky, Windstream Kentucky East, LLC, and Windstream Kentucky West, LLC.⁵ According to the most recent Universal Service

⁴ 47 C.F.R. § 63.71.

⁵ The Universal Service Administrative Company (“USAC”) has assigned Global study area code (“SAC”) 269051 for wireline services. Global will request that USAC cancel this SAC upon approval of this request by the Commission.

Administrative Company data, Global had 22 Lifeline customers in Kentucky as of September 2019.⁶

12. Federal law specifies that the Commission “shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier.”⁷ The federal requirements for relinquishment of ETC designation can be summarized as the following: (1) there must be more than one ETC serving in the area of the ETC seeking relinquishment; (2) the ETC seeking relinquishment must provide advance notice to the relevant public service commission; (3) the subscribers served by the relinquishing ETC must continue to be served by an ETC; and (4) to the extent that additional facilities are required to serve any of the relinquishing ETC’s customers, sufficient notice shall be provided to ensure that the construction or purchase can be timely completed.⁸

13. Global’s wireline ETC service area is served by more than one ETC. Because at least one other ETC serves Global’s ETC service area, federal law provides that the Commission should permit Global to relinquish its ETC designation.

14. Consistent with 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a), Global is filing this notice more than 60 days in advance of the requested effective date of relinquishment of its ETC designation.

15. To the best of Global’s knowledge, Global’s Lifeline subscribers will have at least one alternative ETC from which to choose. Thus, all low-income consumers residing in Global’s ETC service area will continue to be served by an ETC consistent with 47 U.S.C. § 214(e).

⁶ This total does not include Global’s wireless operations under the name of Stand Up Wireless. See <https://www.usac.org/li/tools/disbursements/results.aspx> (last visited Nov. 7, 2019).

⁷ 47 U.S.C. § 214(e)(4).

⁸ See 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a).

16. To the best of Global's knowledge, none of the remaining ETCs will be required to purchase or construct additional facilities to continue to serve consumers within the applicable service area.

17. Global's proposed wireline ETC relinquishment is consistent with the public interest. The services offered by Global are available from other wireline and wireless providers in the Commonwealth serving Global's ETC area. Consequently, Global's subscribers will not be unduly harmed as they will be able to transition to new providers and continue to receive Lifeline discounts.

18. Global will ensure that its subscribers have ample time to find a new service provider in a thoughtful and informed manner. As described above, Global will provide affected customers written notice via U.S. mail of its intent to cease service at least sixty (60) days' in advance of the cessation of service, which equals or exceeds the amount of notice that other carriers in Kentucky relinquishing their ETC designations have provided to their customers.⁹

19. Consistent with other recent ETC relinquishments that the Commission has approved,¹⁰ Global will cease to enroll new Lifeline subscribers from the date of this filing going forward.

20. Global requests that the Commission advance this Application to the front of its docket and issue a decision no later than **December 19, 2019** to permit Global sufficient time to adequately notify its Lifeline subscribers and to ensure an orderly transition.

⁹ See, e.g., *Request of Budget Prepay, Inc. to Relinquish Eligible Telecommunications Carrier Designation*, Case No. 2017-00166 (Ky. PSC Apr. 25, 2017) (30 days); *Application of Cricket Communications, LLC For A Commission Order Granting Relinquishment of Its Designations As A Lifeline-Only Eligible Telecommunications Carrier* Case No. 2015-00135 (Ky. PSC May 14, 2015) (45 days); *Petition of Cincinnati Bell Wireless, LLC For Relinquishment of Eligible Telecommunications Carrier Designation*, Case No. 2014-00140 (Ky. PSC May 16, 2014) (45 days).

¹⁰ See, e.g., *Cricket Communications, LLC* at 2; *Cincinnati Bell Wireless, LLC* at 2.

Conclusion

WHEREFORE, Global Connections Inc. of America requests that the Commission:

1. Place this Application at the front of its docket and enter an Order on the Notice-Application but no later than **December 19, 2019**;
2. Approve Global's request to discontinue wireline telecommunications services in Kentucky, surrender its authority to provide such services in Kentucky, and cancel its existing filed tariff sheets concerning the provision of such services ETC effective **February 19, 2020 or upon receipt of written notification from Global that such services have been discontinued to Global's wireline customers, whichever is later**;
3. Approve the proposed relinquishment of Global's designation as a wireline Lifeline-only ETC effective **February 19, 2020 or upon the receipt of written notification from Global that such service has been discontinued to Global's wireline customers, whichever is later**; and
4. Grant any other relief to which Global may be entitled.

Dated: November 19, 2019

Respectfully submitted,

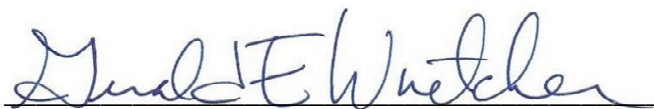


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Counsel for Global Connection Inc. of America

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Global Connection Inc. of America's November 19, 2019 electronic filing of this Application is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Commission on November 19, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Application will be delivered to the Commission on or before November 21, 2019.

A handwritten signature in blue ink that reads "Gerald E. Wuetcher". The signature is written in a cursive style and is positioned above a horizontal line.

Gerald E. Wuetcher

EXHIBIT A

December ____, 2019

NAME
ADDRESS
CITY, STATE ZIP
[Tel No. _____]**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 Kentucky. 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

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 wireline services in Kentucky, please contact Global Connection Customer Service at 800-551-7993.

Sincerely,
Global Connection Inc. of America

Alternative Telephone Companies in Kentucky

[TBD]

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