#### **KELLEY DRYE & WARREN LLP**

A LIMITED LIABILITY PARTNERSHIP

# WASHINGTON HARBOUR, SUITE 400 3050 K STREET, NW WASHINGTON, DC 20007

F A C S I M I L E
(202) 342-8451
www.kelleydrye.com

NEW YORK, NY
LOS ANGELES, CA
HOUSTON, TX
CHICAGO, IL
PARSIPPANY, NJ
STAMFORD, CT
AFFILIATE OFFICE
MUMBAI, INDIA

(202) 342-8400

March 11, 2019

Lynn M. Retz Secretary Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604-4027

19-GCAT-369-CCS

Re: Global Connection Inc. of America Notice of Service Discontinuance and Request for Cancellation of Telecommunications Authorizations

Dear Ms. Retz:

Global Connection Inc. of America (Global or the Company) submits this filing to notify the Kansas Corporation Commission (Commission) of its intention to discontinue provision of wireline telecommunications services in Kansas and to request that the Company's intrastate Kansas wireline telecommunications authority and associated tariffs be cancelled on or after May 11, 2019.

## Discontinuance of Service

At this time, Global has only four customers in Kansas for its wireline services. The Company has provided these customers with at least forty-five (45) days' notice of service discontinuance to be effective beginning on April 26, 2019.<sup>1</sup>

Cancellation of Telecommunications Authority and Tariff

The Commission granted Global authority to provide competitive intrastate wireline telecommunications services in Kansas on July 16, 2004 and July 27, 2004 respectively in

The discontinuances are scheduled to occur on dates beginning April 26, 2019 and concluding on May 10, 2019. The Company intends to time the discontinuances based upon 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. A sample of this notice is appended.

#### **KELLEY DRYE & WARREN LLP**

Page Two

Docket Nos. 04-GCAT-1166-COC (interexchange services) and 04-GCAT-1165-COC (local exchange services).<sup>2</sup> After extensive assessment of the market, Global has determined that its strategic business plans in Kansas do not include the continued provision of wireline telecommunications services.<sup>3</sup> As noted, the Company has but four customers for its wireline services in the State. Accordingly, Global requests cancellation of its certificate and tariff on or after May 11, 2019 (following discontinuance of the Company's Kansas wireline customers). The Company's surrender of its authority will have no adverse consequences for consumers in Kansas as they have access to a range of alternative providers and services.

This filing applies solely to Global's wireline operations in Kansas. <u>Global will</u> continue to operate as a wireless carrier and wireless Eligible Telecommunications Carrier (ETC) in the State.

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

Respectfully submitted

Winafred R. Brantl

Kelley Drye & Warren, LLP 3050 K St., NW Suite 400

Winafied W. Bround

Washington, DC 20007

Counsel for Global Connection Inc. of America

<sup>&</sup>lt;sup>2</sup> Global also operates in Kansas as a provider of commercial mobile radio services (CMRS) under the d/b/a Stand Up Wireless and was designated by the Commission as a Lifeline-only Eligible Telecommunications Carrier in connection with its wireless services on August 31, 2012 in Docket No.12-GCAT-713-ETC.

Global is also discontinuing provision of interstate wireline services to Kansas 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.

#### 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 11 th day of March, 2019.

Notary Public Mun P. Alellan

My Commission expires: April 3, 2020







# 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 <u>not</u> 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