

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

|                                   |   |                            |
|-----------------------------------|---|----------------------------|
| In the Matter of                  | ) | File No. See Appendix      |
|                                   | ) |                            |
| Annual CPNI Certification         | ) | NAL/Acct. No. See Appendix |
|                                   | ) |                            |
| Apparent Liability for Forfeiture | ) | FRN: See Appendix          |
|                                   | ) |                            |
|                                   | ) |                            |

**ORDER**

**Adopted: October 4, 2010**

**Released: October 5, 2010**

By the Assistant Division Chief, Telecommunications Consumers Division, Enforcement Bureau:

1. In this Order, which follows several *Notices of Apparent Liability* (“NALs”) released in February, 2009, we determine that no forfeiture penalties should be imposed on the companies listed in the Appendix.

2. In February, 2009, the Bureau issued to each of these companies a *Notice of Apparent Liability for Forfeiture* based on their apparent violation of section 222 of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> section 64.2009(e) of the Commission’s rules,<sup>2</sup> and the Commission’s *EPIC CPNI Order*<sup>3</sup> by failing to file a compliant CPNI certification with the Bureau. Consistent with section 503(b)(4) of the Act,<sup>4</sup> each of these companies was granted an opportunity to show, in writing, why no such forfeiture should be imposed.

3. Upon review of the record, and based upon additional information provided by these companies, we agree that the companies listed in the Appendix filed compliant annual CPNI certifications for calendar year 2007. Accordingly, we find that the companies listed in the Appendix did not violate section 222 of the Act,<sup>5</sup> section 64.2009(e) of the Commission’s rules,<sup>6</sup> or the Commission’s *EPIC CPNI Order*. Consequently, we conclude that no forfeiture should be imposed.

4. **ACCORDINGLY, IT IS ORDERED** that, pursuant to section 503(b) of the Communications Act of 1934, as amended, and sections 0.111, 0.311, and 1.80(f)(4) of the Commission’s

---

<sup>1</sup> 47 U.S.C. § 222.

<sup>2</sup> 47 C.F.R. § 64.2009(e).

<sup>3</sup> *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers’ Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927, 6953 (2007) (“*EPIC CPNI Order*”); *aff’d sub nom. Nat’l Cable & Telecom. Assoc. v. FCC*, No. 07-132, (D.C. Cir. decided Feb. 13, 2009).

<sup>4</sup> 47 U.S.C. § 503(b)(4).

<sup>5</sup> 47 U.S.C. § 222.

<sup>6</sup> 47 C.F.R. § 64.2009(e).

rules, the proposed forfeitures issued to the companies in the attached Appendix **WILL NOT BE IMPOSED.**

5. **IT IS FURTHER ORDERED** that a copy of this Order shall be sent by First Class Mail and Certified Mail Return Receipt Requested to each of the companies in the attached Appendix.

FEDERAL COMMUNICATIONS COMMISSION

Kimberly A. Wild  
Assistant Division Chief  
Telecommunications Consumers Division  
Enforcement Bureau

## APPENDIX

| Company name and address   | EB File No.   | NAL No.      | FRN        | NAL  |
|--|---------------|--------------|------------|--|
| BKT Telecom, Corp., attn. Ron Petcha, 3235 N. San Fernando Rd., Unit 7B, Los Angeles, CA 90065-1441  | EB-08-TC-3034 | 200932170225 | 0018509133 | <i>BKT Telecom, Corp.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2134 (Enf. Bur. 2009).                           |
| Bellvoz Corp.<br><br>Attorney of record: Edward A. Maldonado, 7925 NW 12 <sup>th</sup> Street, Doral, FL 33126   | EB-09-TC-065  | 200932170024 | 0017992298 | <i>Bellvoz Corp.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1693 (Enf. Bur. 2009).                                |
| Ben Lomand Communications, LLC<br><br>Attorney of record: David L. Nace, Lukas, Nace, Gutierrez & Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102               | EB-09-TC-066  | 200932170025 | 0003729142 | <i>Ben Lomand Communications, LLC</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1687 (Enf. Bur. 2009).               |
| Ben Lomand Rural Telephone Cooperative, Inc.<br><br>Attorney of record: David L. Nace, Lukas, Nace, Gutierrez & Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102 | EB-09-TC-067  | 200932170026 | 0001773464 | <i>Ben Lomand Rural Telephone Cooperative, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1681 (Enf. Bur. 2009). |

| <b>Company name and address</b>   | <b>EB File No.</b> | <b>NAL No.</b> | <b>FRN</b> | <b>NAL</b>   |
|---|--------------------|----------------|------------|--|
| Big Telephone, Inc., attn. Paul Joncas, 315 Pleasant Street, Fall River, MA 02727   | EB-09-TC-068       | 200932170027   | 0017197344 | <i>Big Telephone, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1675 (Enf. Bur. 2009)                     |
| Buckeye Telesystem, Inc., attn. Thomas K. Dawson, Vice President, 5555 Airport Highway, Toledo, OH 43615                            | EB-09-TC-070       | 200932170029   | 0004319406 | <i>Buckeye Telesystem, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1729 (Enf. Bur. 2009).               |
| Cherokee Telephone Company<br><br>Attorney of record: Stephen G. Kraskin, 2154 Wisconsin Avenue, NW, Washington, DC 20007           | EB-09-TC-071       | 200932170030   | 0003723061 | <i>Cherokee Telephone Company</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1735 (Enf. Bur. 2009).             |
| China Telecom (Americas) Corporation<br><br>Attorney of record: Laura B. Sherman, LLC, 3335 N. Randolph Street, Arlington, VA 22207 | EB-09-TC-072       | 200932170031   | 0007408073 | <i>China Telecom (Americas) Corporation</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1741 (Enf. Bur. 2009).   |
| Clear World Communications Corporation, attn. James Mancuso, 3501 South Harbor Blvd., Suite 100, Santa Ana, CA 92704                | EB-09-TC-076       | 200932170035   | 0003736360 | <i>Clear World Communications Corporation</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1765 (Enf. Bur. 2009). |

| Company name and address  | EB File No.  | NAL No.      | FRN        | NAL  |
|---|--------------|--------------|------------|--|
| Consolidated Telephone Company<br><br>Attorney of record:<br>M. Cecilia Ray,<br>Moss & Barnett,<br>4800 Wells Fargo<br>Center, 90 South<br>Seventh Street,<br>Minneapolis, MN<br>55402-4129 | EB-09-TC-080 | 200932170039 | 0003742467 | <i>Consolidated Telephone Company, Apparent Liability for Forfeiture, 24 FCC Rcd 1759 (Enf. Bur. 2009).</i>                        |
| D.G.A. Telecom, Inc.<br><br>Attorney of record:<br>Edward A.<br>Maldonado, 7925<br>NW 12 <sup>th</sup> Street,<br>Doral, FL 33126   | EB-09-TC-083 | 200932170042 | 0011443066 | <i>D.G.A. Telecom, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 1771 (Enf. Bur. 2009).</i>                                  |
| E & F Telecom, Inc.<br><br>Attorney of record:<br>Edward A.<br>Maldonado, 7925<br>NW 12 <sup>th</sup> Street,<br>Doral, FL 33126  | EB-09-TC-091 | 200932170050 | 0017199878 | <i>E &amp; F Telecom, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 2104 (Enf. Bur. 2009).</i>                               |
| EGIX, Inc., attn.<br>Steven L. Johns,<br>11550 N. Meridian<br>Street, Suite 500,<br>Carmel, IN 46032  | EB-09-TC-093 | 200932170052 | 0004999223 | <i>EGIX, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 2116 (Enf. Bur. 2009).</i>  |
| E.Com Technologies, LLC d/b/a First Mile Technologies, attn.<br>Paul Estridge, Jr.,<br>14300 Clay Terrace Blvd.,<br>Suite 200, Carmel,<br>IN 46032  | EB-09-TC-097 | 200932170056 | 0004330130 | <i>E.Com Technologies, LLC d/b/a First Mile Technologies, Apparent Liability for Forfeiture, 24 FCC Rcd 2140 (Enf. Bur. 2009).</i> |

| Company name and address  | EB File No.  | NAL No.      | FRN        | NAL   |
|---|--------------|--------------|------------|---|
| Gabriel Wireless, LLC, attn. Lawrence J. Gabriel, Jr., 6971 N. Federal Highway, Suite 206, Boca Raton, FL 33487             | EB-09-TC-098 | 200932170057 | 0003770773 | <i>Gabriel Wireless, LLC</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2146 (Enf. Bur. 2009).                     |
| GOES Telecom, Inc., attn. Norman Brandinger, 271 Main Street, Suite C, Hackettstown, NJ 07840-2032                          | EB-09-TC-104 | 6519841125   | 0011437746 | <i>GOES Telecom, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2177 (Enf. Bur. 2009).                        |
| Highland Communications, LLC, attn. Scott MacIntyre, 30 Daniel Webster Highway, Suite 10, Merrimack, NH 03054               | EB-09-TC-107 | 200932170066 | 0011107539 | <i>Highland Communications, LLC</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2189 (Enf. Bur. 2009).              |
| Kitchen Productions d/b/a Tortoise Paging, attn. Edward Tipler, Tortoise Communications, P.O. Box 544, Ridgecrest, CA 93556 | EB-09-TC-116 | 200932170075 | 0003798220 | <i>Kitchen Productions d/b/a Tortoise Paging</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1822 (Enf. Bur. 2009). |
| Latino Telecom, Inc.<br><br>Attorney of record: Edward A. Maldonado, 7925 NW 12 <sup>th</sup> Street, Doral, FL 33126       | EB-09-TC-118 | 200932170077 | 0017294992 | <i>Latino Telecom, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 1834 (Enf. Bur. 2009).                      |

| <b>Company name and address</b>  | <b>EB File No.</b> | <b>NAL No.</b> | <b>FRN</b> | <b>NAL</b>   |
|--|--------------------|----------------|------------|--|
| Legacy Long Distance International, Inc.,<br>attn. Curtis Brown,<br>10833 Valley View Street, Suite 150,<br>Cypress, CA 90630                    | EB-09-TC-120       | 200932170079   | 0003725322 | <i>Legacy Long Distance International, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 1852 (Enf. Bur. 2009).</i>                    |
| Liberty Contracting and Consulting LLC<br><br>Attorney of record:<br>Edward A. Maldonado, 7925 NW 12 <sup>th</sup> Street,<br>Doral, FL 33126    | EB-09-TC-121       | 200932170080   | 001740390  | <i>Liberty Contracting and Consulting LLC, Apparent Liability for Forfeiture, 24 FCC Rcd 1864 (Enf. Bur. 2009).</i>                      |
| Angel Communications LLC d/b/a Mr. Radio of Arizona, Inc.,<br>attn. Scott MacIntyre, 30 Daniel Webster Highway, Suite 10,<br>Merrimack, NH 03054 | EB-09-TC-129       | 200932170088   | 0014033773 | <i>Angel Communications LLC d/b/a Mr. Radio of Arizona, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 1919 (Enf. Bur. 2009).</i>   |
| National Brands, Inc. d/b/a Sharenet Communications Company,<br>attn. Gary Joseph, 4633 West Polk Street,<br>Phoenix, AZ 85043                   | EB-09-TC-130       | 200932170089   | 0003710662 | <i>National Brands, Inc. d/b/a Sharenet Communications Company, Apparent Liability for Forfeiture, 24 FCC Rcd 1988 (Enf. Bur. 2009).</i> |

| <b>Company name and address</b>   | <b>EB File No.</b> | <b>NAL No.</b> | <b>FRN</b> | <b>NAL</b>  |
|---|--------------------|----------------|------------|---|
| <p>Network Innovations, Inc.</p> <p>Attorney of record;<br/>Neil S. Ende,<br/>Technology Law Group, 5335 Wisconsin Ave., NW, Suite 440, Washington, DC 20015</p>  | EB-09-TC-133       | 200932170092   | 0010737641 | <i>Network Innovations, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 2000 (Enf. Bur. 2009).</i>                          |
| <p>Nunn Telephone Company</p> <p>Attorney of record:<br/>Gerard J. Duffy,<br/>Blooston, Mordkofsky, Dickens, Duffy, and Prendergast, LLP, 2120 L Street, NW, Washington, DC 20037</p>                             | EB-09-TC-135       | 200932170094   | 0004311809 | <i>Nunn Telephone Company, Apparent Liability for Forfeiture, 24 FCC Rcd 2006 (Enf. Bur. 2009).</i>                             |
| <p>Phillips County Telephone Company d/b/a PC Telecom</p> <p>Attorney of record:<br/>Gerard J. Duffy,<br/>Blooston, Mordkofsky, Dickens, Duffy, and Prendergast, LLP, 2120 L Street, NW, Washington, DC 20037</p> | EB-09-TC-139       | 200932170098   | 0004314316 | <i>Phillips County Telephone Company d/b/a PC Telecom, Apparent Liability for Forfeiture, 24 FCC Rcd 2024 (Enf. Bur. 2009).</i> |
| <p>Prime Time Ventures, LLC,<br/>attn. Jeff Rhoden,<br/>288 S. Pacific Highway, Talent, OR 97540</p>  | EB-09-TC-142       | 200932170101   | 0009783093 | <i>Prime Time Ventures, LLC, Apparent Liability for Forfeiture, 24 FCC Rcd 2030 (Enf. Bur. 2009).</i>                           |



| Company name and address   | EB File No.  | NAL No.      | FRN        | NAL   |
|--|--------------|--------------|------------|---|
| <p>Protek Leasing Corp.</p> <p>Attorney of record:<br/>Katherine Patsas Nevitt, Lukas, Nace, Gutierrez &amp; Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102</p>                        | EB-09-TC-145 | 200932170104 | 0005814157 | <i>Protek Leasing Corp.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2048 (Enf. Bur. 2009).                    |
| <p>Santa Rosa Communications, Ltd., attn. Jason Tole, Chief Financial Officer, 7110 Hwy. 287 East, Vernon, TX 76385-2128</p>   | EB-09-TC-150 | 200932170109 | 0003736188 | <i>Santa Rosa Communications, Ltd.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2062 (Enf. Bur. 2009).         |
| <p>Santa Rosa Telephone Cooperative, Inc., attn. Jason Tole, Chief Financial Officer, 7110 Hwy. 287 East, Vernon, TX 76385-2128</p>  | EB-09-TC-151 | 200932170110 | 0005063615 | <i>Santa Rosa Telephone Cooperative, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2068 (Enf. Bur. 2009).  |
| <p>Santel Communications Cooperative, Inc.</p> <p>Attorney of record:<br/>Gerard J. Duffy, Blooston, Mordkofsky, Dickens, Duffy, and Prendergast, LLP, 2120 L Street, NW, Washington, DC 20037</p> | EB-09-TC-152 | 200932170111 | 0003758877 | <i>Santel Communications Cooperative, Inc.</i> , Apparent Liability for Forfeiture, 24 FCC Rcd 2074 (Enf. Bur. 2009). |

| <b>Company name and address</b>   | <b>EB File No.</b> | <b>NAL No.</b> | <b>FRN</b> | <b>NAL</b>  |
|---|--------------------|----------------|------------|---|
| <p>Shreveport Communications Services, Inc.</p> <p>Attorney of record:<br/>Audrey P. Rasmussen, 1120 20<sup>th</sup> Street, NW, Suite 700, North Building, Washington, DC 20036-3406</p> | EB-09-TC-155       | 200932170114   | 0014198253 | <i>Shreveport Communications Services, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 2086 (Enf. Bur. 2009).</i>     |
| <p>South Central Wireless, Inc. d/b/a SCTelecom</p> <p>Attorney of record:<br/>Stephen G. Kraskin, 2154 Wisconsin Avenue, NW, Washington, DC 20007</p>                                    | EB-09-TC-158       | 200932170117   | 001776457  | <i>South Central Wireless, Inc. d/b/a SCTelecom, Apparent Liability for Forfeiture, 24 FCC Rcd 2122 (Enf. Bur. 2009).</i> |
| <p>Specialized Mobile Radio, Inc.</p> <p>Attorney of record:<br/>Katherine Patsas Nevitt, Lukas, Nace, Gutierrez &amp; Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102</p>     | EB-09-TC-159       | 200932170118   | 0018509752 | <i>Specialized Mobile Radio, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 2128 (Enf. Bur. 2009).</i>               |
| <p>T2 Communications, LLC, attn. Gerardo Tonini, Vice President, 301 Hoover Blvd., Suite 100, Holland, MI 49423</p>   | EB-09-TC-163       | 200932170122   | 0009725748 | <i>T2 Communications, LLC, Apparent Liability for Forfeiture, 24 FCC Rcd 2152 (Enf. Bur. 2009).</i>                       |

| <b>Company name and address</b>  | <b>EB File No.</b> | <b>NAL No.</b> | <b>FRN</b> | <b>NAL</b>   |
|--|--------------------|----------------|------------|--|
| TeleSpan Carrier Access, LLC, attn. Dominic K. Bohnett, 125 E. De La Guerra Street, Suite 201, Santa Barbara, CA 93101                                       | EB-09-TC-167       | 200932170126   | 0010635696 | <i>TeleSpan Carrier Access, LLC, Apparent Liability for Forfeiture, 24 FCC Rcd 2195 (Enf. Bur. 2009).</i>        |
| Volunteer First Services, Inc.<br><br>Attorney of record: David L. Nace, Lukas, Nace, Gutierrez & Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102 | EB-09-TC-179       | 200932170138   | 0010827806 | <i>Volunteer First Services, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 1895 (Enf. Bur. 2009).</i>      |
| Scott C. MacIntyre<br><br>10 Rimmon Court, Merrimack, NH 03054   | EB-09-TC-183       | 200932170142   | 0004921219 | <i>Scott C. MacIntyre, Apparent Liability for Forfeiture, 24 FCC Rcd 1931 (Enf. Bur. 2009).</i>                  |
| Data Radio Management Company, Inc., attn. Scott C. MacIntyre, 30 Daniel Webster Highway, Suite 9, Merrimack, NH 03054                                       | EB-09-TC-184       | 200932170043   | 0003665064 | <i>Data Radio Management Company, Inc., Apparent Liability for Forfeiture, 24 FCC Rcd 1925 (Enf. Bur. 2009).</i> |
| S12Way, Inc.<br><br>Attorney of record: Katherine Patsas Nevitt, Lukas, Nace, Gutierrez & Sachs, 1650 Tysons Boulevard, Suite 1500, McLean, VA 22102         | EB-09-TC-189       | 200932170148   | 0009809278 | <i>S12Way, Inc, Apparent Liability for Forfeiture, 24 FCC Rcd 1949 (Enf. Bur. 2009).</i>                         |