

Jonathan S. Marashlian, Esq.  
c/o The CommLaw Group  
June 2, 2008  
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2005 Form 499-A

On September 7, 2007, USAC received from Compass Global a 2005 Form 499-A marked as a "revision." Also included, as Attachment 1, was an unsigned copy of Compass Global's 2005 Form 499-A marked as "original." The Attachment 1 narrative indicated that the form had been submitted to USAC on September 4, 2006. USAC has no record of receiving the form marked as "original" prior to September 7, 2007.

USAC accepted and processed the September 7, 2007 submission as Compass Global's original filing because USAC did not have a record of previously receiving a 2005 Form 499-A from the company. USAC relied on the revenue reported on the 2005 Form 499-A to determine Compass Global's Universal Service Fund (USF) contribution obligation, which was reflected on the company's October, November and December 2007 invoices.<sup>4</sup>

2006 Form 499-A

On September 7, 2006, USAC received and processed an original 2006 Form 499-A. Nearly a year later, on September 5, 2007, USAC received a revised 2006 Form 499-A, which it rejected as untimely because it was not filed "within one year of the original submission."

The rejection letters referenced above, incorrectly stated "we are unable to accept the revision because it is not filed within one year of the original submission." In actuality, Commission rules state a downward revision may only be accepted by USAC within one year of the original due date for the form. On December 9, 2004, the Federal Communications Commission (FCC or Commission) issued the *Form 499-A Revision Order*,<sup>5</sup> which, among other things, established a one year deadline beyond the *original filing deadline* for revisions to a Form 499-A that would result in a reduced USF contribution.<sup>6</sup> The Order specifically sets March 31 of the "year after the original filing due date" as the deadline for any submitted revisions that would result in decreased USF

<sup>4</sup> USAC encourages Compass Global to contact USAC's Customer Service Bureau at (888) 641-8722 with any questions concerning calculation of its universal service obligation. However, Compass Global should be aware that such discussions do not delay or toll and deadlines for filing further appeals for this matter as set forth in 47 C.F.R. §§ 54.719 - .720.

<sup>5</sup> See *Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review - Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms; Changes to the Board of Directors of the National Exchange Carrier Association, Inc.*, CC Docket Nos. 96-45, 98-71, 97-21, Order, DA 04-3669, 20 FCC Rcd 1012 (2004) (*Form 499-A Revision Order*) (FCC established a downward revision deadline of one year from the original due date for FCC Forms 499-A, not from the date of the original submission as stated in USAC's rejection letter). See also, *Form 499-A Revision Order*, ¶ 10 ("We adopt a twelve-month deadline for filing revisions to the Form 499-A which would result in a decreased contribution amount.").

<sup>6</sup> *Id.*

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contribution obligations.<sup>7</sup> USAC apologizes to Compass Global for this error. Nonetheless, the incorrect language in USAC's letter does not alter the fact that Compass Global did not meet the filing deadlines for the 2005 and 2006 Forms 499-A, which are specified in Commission rules, stated in the form instructions and included on USAC's website.

Decision on Appeal: Denied as moot in part, and denied in part.

Analysis

2005 499-A

The 2005 Form 499-A rejection letter did not correctly state why the 2005 Form 499-A Compass Global designated as "original" was rejected because the letter did not distinguish between the two different 2005 Forms 499-A submitted by Compass Global on September 7, 2007. The rejection letter stated that USAC could not accept the revised 2005 Form 499-A. In fact, USAC rejected the 2005 Form 499-A marked as "original" because USAC has no record of ever receiving this filing. Instead, USAC accepted the 2005 Form 499-A Compass Global marked as "revised" and considered that as the original filing for 2005. Thus the "revised" 2005 Form 499-A was processed as the original 2005 Form 499-A and the 2005 Form 499-A marked as "original" was rejected. Therefore, USAC assessed Compass Global's USF contribution based on the "revised" 2005 Form 499-A, which USAC considered as the true original 2005 Form 499-A submission.

Because USAC's review indicates the relief requested by Compass Global in this instance has been provided (i.e., USAC determined Compass Global's USF contribution obligations for 2004, which totaled \$10,105.80 in support mechanism charges,<sup>8</sup> based on the downwardly "revised" 2005 Form 499-A submitted on September 7, 2007), the request is moot. As such, there is no relief necessary and this portion of Compass Global's Appeal is denied as moot.

2006 499-A

USAC relied on revenue reported on the 2006 Form 499-A submitted on September 7, 2006 to determine Compass Global's 2005 USF contribution obligation and billed Compass Global adjustments totaling \$88,841.91 on its January, February and March 2007 invoices. In addition, the company received a late filing fee of \$1,451.96 for failure to timely submit its 2006 Form 499-A. The 2006 Form 499-A was due April 3, 2006 and

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<sup>7</sup> *Id.*

<sup>8</sup> In addition to the universal service obligation of \$10,105.80 the company was billed a late filing fee of \$1,042.42 because the form, which had a due date of April 1, 2005, was received on September 7, 2007.

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had a one-year downward revision deadline of March 31, 2007.<sup>9</sup> Because the revised 2006 Form 499-A was received on September 5, 2007, after the March 31, 2007 deadline for 2006 Form 499-A downward revisions, USAC properly rejected the form. Accordingly, this portion of Compass Global's Appeal is denied.

#### Recent FCC Action

On April 9, 2008, the FCC released a *Notice of Apparent Liability* (NAL) concerning, among other things, Compass Global's failure to timely pay billings based on its 2005 and 2006 reported revenue.<sup>10</sup> This *Administrator's Decision on Contributor Appeal* denies Compass Global's request for revision to its 2005 revenue as the company did not timely file revised revenue. The timeliness of the filing of Compass Global's revised 2005 revenue is not addressed in the NAL and the decisions set forth in this letter do not have an impact on the findings identified in the NAL and do not address 2006 revenue.

If you wish to further appeal this decision, you may file an appeal with the FCC. Detailed instructions for filing appeals are available at:

<http://www.universalservice.org/fund-administration/contributors/file-appeal>

Sincerely,

USAC

#### Attachments

cc: Regina Dorsey, FCC Office of Managing Director  
Hillary DeNigro, FCC Enforcement Bureau  
Trent Harkrader, FCC Enforcement Bureau  
Greg Guice, FCC Wireline Competition Bureau

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<sup>9</sup> *Form 499-A Revision Order*, ¶ 10.

<sup>10</sup> *See Compass Global, Inc. Notice of Apparent Liability for Forfeiture*, File No. EB-06-1H-3060, FCC 08-97 (2008) (NAL).

**EXHIBIT 1**



Universal Service Administrative Company

September 11, 2007

Attn: Jonathan Marashlian  
Compass Global, Inc.  
50 Tice Blvd., 3rd Floor  
Woodcliff Lake, NJ 07677

Form 499 Filer ID: 826216

**RE: 2005 FCC Form 499-A Revision Rejection**

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by 826216 Compass Global, Inc. for the period 2004. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

**If you wish to appeal this decision with USAC, your appeal must be postmarked no later than 60 days after the date of USAC's rejection letter. Appeals postmarked after 60 days from the date of this letter will be automatically dismissed.**

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Form 499-Q rejection letter and identify the outcome that you request.
- Be sure to refer to CC Docket No. 96-45 on all communication with the FCC.
- The appeal must identify the "Legal Reporting Name" and "Filer 499 ID".
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Explain the appeal to the USAC. Please provide documentation to support your appeal.
- Attach a photocopy of this Revised Form 499-Q Rejection decision that you are appealing.
- Mail your letter to:  
Letter of Appeal  
USAC  
2000 L Street, NW, Suite 200  
Washington, DC 20036
- **Appeals submitted by fax, telephone call, and e-mail will not be processed.**

The response will indicate whether USAC:

- Agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-Q Rejection Letter; or
- Disagrees with your letter of appeal, and the reasons therefore.

If you disagree with USAC's response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." Again, please note your appeal must be postmarked no later than 60 days after the date of the Appeal Decision. Appeals postmarked after 60 days from the date of USAC's response to your appeal will be automatically dismissed. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.725) are available on the FCC web site ([www.fcc.gov](http://www.fcc.gov)).

2000 L Street, N.W., Suite 200, Washington, DC 20036 Voice (888) 641-8722 Option 2, Option 1 Fax (202) 776-0380  
Visit us online at: <http://www.universalservice.org>

Please be sure to refer to CC Docket No. 96-45 on all communication with the FCC. The appeal must also provide your company's name and Filer ID, plus necessary contact information, including the name, address, telephone number, fax number, and e-mail address of the person filing the appeal. Unless the appeal is by ECFS, please include a copy of the decision at issue.

Appeals submitted via the United States Postal Service, should be sent to the address below (For security purposes, hand-delivered or messenger-delivered documents will not be accepted at this Washington, DC address):

Federal Communications Commission  
Office of the Secretary  
445 - 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Documents sent by hand-delivery or messenger should be sent to the following address:

Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743  
(8:00 A.M. - 5:30 P.M. ET)

Appeals may also be submitted to the FCC electronically, either by the Electronic Comment Filing System (ECFS) or by fax. The FCC recommends filing with the ECFS to ensure timely filing. Instructions for using ECFS can be found on the ECFS page of the FCC web site. Appeals to the FCC filed by fax must be faxed to 202-418-0187. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 A.M. (midnight), Eastern Standard Time. Fax transmissions will be considered filed on a business day if the complete transmission is received at any time before 12:00 A.M.

If you have questions or concerns regarding this letter, please contact USAC Customer Service at (888) 641-8722 Option 1, Option 2.

Sincerely,

USAC



September 11, 2007

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Compass Global, Inc.  
50 Tice Blvd., 3rd Floor  
Woodcliff Lake, NJ 07677

Form 499 Filer ID: 826216

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- Explain the appeal to the USAC. Please provide documentation to support your appeal.
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Letter of Appeal  
USAC  
2000 L Street, N.W., Suite 200  
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Please be sure to refer to CC Docket No. 96-45 on all communication with the FCC. The appeal must also provide your company's name and Filer ID, plus necessary contact information, including the name, address, telephone number, fax number, and e-mail address of the person filing the appeal. Unless the appeal is by ECFS, please include a copy of the decision at issue.

Appeals submitted via the United States Postal Service, should be sent to the address below (For security purposes, hand-delivered or messenger-delivered documents will not be accepted at this Washington, DC address):

Federal Communications Commission  
Office of the Secretary  
445 - 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Documents sent by hand-delivery or messenger should be sent to the following address:

Federal Communications Commission  
Office of the Secretary  
9300 East Hampion Drive  
Capitol Heights, MD 20743  
(8:00 A.M. - 5:30 P.M. ET)

Appeals may also be submitted to the FCC electronically, either by the Electronic Comment Filing System (ECFS) or by fax. The FCC recommends filing with the ECFS to ensure timely filing. Instructions for using ECFS can be found on the ECFS page of the FCC web site. Appeals to the FCC filed by fax must be faxed to 202-418-0187. Electronic appeals will be considered filed on a business day if they are received at any time before 12:00 A.M. (midnight), Eastern Standard Time. Fax transmissions will be considered filed on a business day if the complete transmission is received at any time before 12:00 A.M.

If you have questions or concerns regarding this letter, please contact USAC Customer Service at (888) 641-8722 Option 1, Option 2.

Sincerely,

USAC

EXHIBIT 14

“499A – April 2005 Filing”, as printed from  
USAC Website,  
<http://www.usac.org/fund-administration/forms>

**2005 FCC Form 499-A Telecommunications Reporting Worksheet**

Approval by OMB  
3060-0855

>>> Please read instructions before completing. <<<

Annual Filing -- due April 1.

**Block 1: Contributor Identification Information**

During the year, carriers must refile Blocks 1, 2 and 5 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (888) 641-8722. If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.]	826216		
102 Legal name of reporting entity	Compass Global, Inc.		
103 IRS employer identification number	22-3559398		
104 Name telecommunications service provider is doing business as	Compass Global, Inc.		
105 Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see directions.]			
<input type="checkbox"/> All Distance	<input type="checkbox"/> CAP/CLEC	<input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale)	<input type="checkbox"/> Coaxial Cable
<input type="checkbox"/> Incumbent LEC	<input type="checkbox"/> Interexchange Carrier (IXC)	<input type="checkbox"/> Local Reseller	<input type="checkbox"/> Operator Service Provider (OSP)
<input type="checkbox"/> Payphone Service Provider	<input type="checkbox"/> Prepaid Card	<input type="checkbox"/> Private Service Provider	<input type="checkbox"/> Satellite Service Provider
<input type="checkbox"/> Shared-Tenant Service Provider / Building LEC	<input type="checkbox"/> SMR (dispatch)	<input type="checkbox"/> Toll Reseller	<input type="checkbox"/> Wireless Data
If Other Local, Other Mobile or Other Toll is selected, <input type="checkbox"/> Other Local <input type="checkbox"/> Other Mobile <input checked="" type="checkbox"/> Other Toll			
describe carrier type / services provided: --> Toll-free PIN Accessible Prepaid Platform Services			
106.1 Holding company name (All affiliated companies must show the same name on this line.)	Compass Global, Inc.		
106.2 Holding company IRS employer identification number	22-3559398		
107 FCC Registration Number (FRN) [ https://svartifoss2.fcc.gov/cores/CoresHome.html ] [For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov]	0009-6902-55		
108 Management company [if carrier is managed by another entity]			
109 Complete mailing address of reporting entity corporate headquarters	Street 1 50 Tice Blvd., 3rd Floor	City Woodcliff Lake	
	Street 2	St NJ	Zip 07677
	Street 3	Country	
110 Complete business address for customer inquiries and complaints [if different from address entered on Line 109] check if same as Line 109 <input checked="" type="checkbox"/>	Street 1 50 Tice Blvd., 3rd Floor	City Woodcliff Lake	
	Street 2	St NJ	Zip 07677
	Street 3	Country	
111 Telephone number for customer complaints and inquiries [Toll-free number if available]	( 201 ) - 802-0600	Ext	
112 List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.			
a Forval International Tel	g		
b	h		
c	i		
d	j		
e	k		
f	l		

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

**2005 FCC Form 499-A Telecommunications Reporting Worksheet**

**Block 2-A: Regulatory Contact Information**

201 Filer 499 ID [from Line 101]	826216								
202 Legal name of reporting entity [from Line 102]	Compass Global, Inc.								
203 Person who completed this Worksheet	<b>First</b>	Jonathan			<b>Last</b>	Marashlian			
204 Telephone number of this person		( 703 ) - 714-1313	<b>Ext</b>						
205 Fax number of this person		( 703 ) - 714-1330							
206 E-mail of this person	jsm@commlawgroup.com								
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	<b>Street 1</b>	Compass Global, Inc.	<b>City</b>	Woodcliff Lake	<b>First</b>	Dean	<b>Last</b>	Cary	
	<b>Street 2</b>	50 Tice Blvd., 3rd Floor	<b>St</b>	NJ	<b>Zip</b>	07677	<b>Ph.</b>	201 802-0600	<b>Ext</b>
	<b>Street 3</b>		<b>E-Mail</b>	none@none.com	<b>fax</b>				
208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	<b>Street 1</b>	Compass Global, Inc.	<b>City</b>	Woodcliff Lake	<b>First</b>	Dean	<b>Last</b>	Cary	
	<b>Street 2</b>	50 Tice Blvd., 3rd Floor	<b>St</b>	NJ	<b>Zip</b>	07677	<b>Ph.</b>	201 802-0600	<b>Ext</b>
	<b>Street 3</b>		<b>E-Mail</b>	none@none.com	<b>fax</b>				

**Block 2-B: Agent for Service of Process**

All carriers must complete Lines 209 through 213.

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

209 D.C. Agent for Service of Process per 47 U.S.C. §413	<b>First</b>	Jero'd	<b>Last</b>	Schnieder	<b>Company</b>	
210 Telephone number of D.C. agent		( 202 ) - 393-6222	<b>Ext</b>			
211 Fax number of D.C. agent		( ) -				
212 E-mail of D.C. agent						
213 Complete business address of D.C. agent for hand service of documents	<b>Street 1</b>	801 Pennsylvania Ave., NW	<b>City</b>	Washington		
	<b>Street 2</b>	Suite 600	<b>St</b>		<b>Zip</b>	20004
	<b>Street 3</b>					
214 Local/alternate Agent for Service of Process (optional)	<b>First</b>	Jonathan	<b>Last</b>	Marashlian	<b>Company</b> Helin & Marashlian, LLC, The CommLaw Group	
215 Telephone number of local/alternate agent		( 703 ) - 714-1300	<b>Ext</b>			
216 Fax number of local/alternate agent		( 703 ) - 714-1330				
217 E-mail of local/alternate agent	jsm@commlawgroup.com					
218 Complete business address of local/alternate agent for hand service of documents	<b>Street 1</b>	1483 Chain Bridge Road	<b>City</b>	McLean		
	<b>Street 2</b>	Suite 331	<b>St</b>	VA	<b>Zip</b>	22101
	<b>Street 3</b>					

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Block 2-C: FCC Registration and Contact Information

Carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

219 Filer 499 ID [from Line 101]	826216		
220 Legal name of reporting entity [from Line 102]	Compass Global, Inc.		
221 Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)	First <input type="text" value="Dean"/>	Last <input type="text" value="Cary"/>	
222 Business address of individual named on Line 221	check if same as Line 109 <input checked="" type="checkbox"/>	Street 1 50 Tice Blvd., 3rd Floor Street 2	Street 3 City Woodcliff Lake St NJ Zip 07677
223 Second ranking company officer, such as Chairman (Must be someone other than the individual listed on Line 221)	First <input type="text"/>	Last <input type="text"/>	
224 Business address of individual named on Line 223	check if same as Line 109 <input type="checkbox"/>	Street 1 Street 2	Street 3 City St Zip
225 Third ranking company officer, such as President or Secretary (Must be someone other than individuals listed on Lines 221 or 223)	First	Last	
226 Business address of individual named on Line 225	check if same as Line 109 <input type="checkbox"/>	Street 1 Street 2	Street 3 City St Zip
227 Indicate jurisdictions in which the filing entity provides telecommunications service. Include jurisdictions in which telecommunications service was provided in the past 15 months and jurisdictions in which telecommunications service is likely to be provided in the next 12 months.			
<input type="checkbox"/> Alabama	<input type="checkbox"/> Guam	<input type="checkbox"/> Massachusetts	<input checked="" type="checkbox"/> New York
<input type="checkbox"/> Alaska	<input type="checkbox"/> Hawaii	<input type="checkbox"/> Michigan	<input type="checkbox"/> North Carolina
<input type="checkbox"/> American Samoa	<input type="checkbox"/> Idaho	<input type="checkbox"/> Midway Atoll	<input type="checkbox"/> North Dakota
<input type="checkbox"/> Arizona	<input type="checkbox"/> Illinois	<input type="checkbox"/> Minnesota	<input type="checkbox"/> Northern Mariana Islands
<input type="checkbox"/> Arkansas	<input type="checkbox"/> Indiana	<input type="checkbox"/> Mississippi	<input type="checkbox"/> Ohio
<input type="checkbox"/> California	<input type="checkbox"/> Iowa	<input type="checkbox"/> Missouri	<input type="checkbox"/> Oklahoma
<input type="checkbox"/> Colorado	<input type="checkbox"/> Johnston Atoll	<input type="checkbox"/> Montana	<input type="checkbox"/> Oregon
<input type="checkbox"/> Connecticut	<input type="checkbox"/> Kansas	<input type="checkbox"/> Nebraska	<input type="checkbox"/> Pennsylvania
<input type="checkbox"/> Delaware	<input type="checkbox"/> Kentucky	<input type="checkbox"/> Nevada	<input type="checkbox"/> Puerto Rico
<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New Hampshire	<input type="checkbox"/> Rhode Island
<input type="checkbox"/> Florida	<input type="checkbox"/> Maine	<input checked="" type="checkbox"/> New Jersey	<input type="checkbox"/> South Carolina
<input type="checkbox"/> Georgia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New Mexico	<input type="checkbox"/> South Dakota
			<input type="checkbox"/> Tennessee
			<input type="checkbox"/> Texas
			<input type="checkbox"/> Utah
			<input type="checkbox"/> U.S. Virgin Islands
			<input type="checkbox"/> Vermont
			<input type="checkbox"/> Virginia
			<input type="checkbox"/> Wake Island
			<input type="checkbox"/> Washington
			<input type="checkbox"/> West Virginia
			<input type="checkbox"/> Wisconsin
			<input type="checkbox"/> Wyoming

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Block 3: Carrier's Carrier Revenue Information

301 Filer 499 ID [from Line 101] 826216  
 302 Legal name of reporting entity [from Line 102] Compass Global, Inc.

Report billed revenues for January 1 through December 31, 2004.  
 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.

See instructions regarding percent interstate & international.  
**Revenues from Services Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms**

*Fixed local service*

Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs

	Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
303.1 Provided as unbundled network elements (UNEs)	\$0.00	0.00	0.00	\$0.00	\$0.00
303.2 Provided under other arrangements	\$0.00	0.00	0.00	\$0.00	\$0.00

Per-minute charges for originating or terminating calls

304.1 Provided under state or federal access tariff	\$0.00	0.00	0.00	\$0.00	\$0.00
304.2 Provided as unbundled network elements or other contract arrangement	\$0.00	0.00	0.00	\$0.00	\$0.00

305 Local private line & special access service	\$0.00	0.00	0.00	\$0.00	\$0.00
306 Payphone compensation from toll carriers	\$0.00	0.00	0.00	\$0.00	\$0.00
307 Other local telecommunications service revenues	\$0.00	0.00	0.00	\$0.00	\$0.00
308 Universal service support revenues received from Federal or state sources	\$0.00	0.00	0.00	\$0.00	\$0.00

*Mobile services (including wireless telephony, paging, & messaging, and other mobile services)*

309 Monthly, activation, and message charges except toll	\$0.00	0.00	0.00	\$0.00	\$0.00
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*Toll services*

310 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)	\$0.00	0.00	0.00	\$0.00	\$0.00
311 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)	\$0.00	0.00	0.00	\$0.00	\$0.00
312 Long distance private line services	\$0.00	0.00	0.00	\$0.00	\$0.00
313 Satellite services	\$0.00	0.00	0.00	\$0.00	\$0.00
314 All other long distance services	\$0.00	0.00	0.00	\$0.00	\$0.00

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers is a direct contributor to the federal universal service support mechanism and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. (See instructions.)

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Block 4-A: End-User and Non-Telecommunications Revenue Information

401 Filer 499 ID [from Line 101]

B25216

402 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

Report billed revenues for January 1 through December 31, 2004.  
Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.  
See instructions regarding percent interstate & international.

	Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
<b>Revenues from All Other Sources (end-user telecom. &amp; non-telecom.)</b>					
403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Fixed local services</i>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges	\$0.00	0.00	0.00	\$0.00	\$0.00
404.1 Provided at a flat rate including interstate toll service					
404.2 Provided without interstate toll included (see instructions)	\$0.00	0.00	0.00	\$0.00	\$0.00
405 Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer	\$0.00	0.00	0.00	\$0.00	\$0.00
406 Local private line and special access service	\$0.00	0.00	0.00	\$0.00	\$0.00
407 Payphone coin revenues (local and long distance)	\$0.00	0.00	0.00	\$0.00	\$0.00
408 Other local telecommunications service revenues	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</i>					
409 Monthly and activation charges	\$0.00	0.00	0.00	\$0.00	\$0.00
410 Message charges including roaming, but excluding toll charges	\$0.00	0.00	0.00	\$0.00	\$0.00
<i>Toll services</i>					
411 Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards	\$0.00	0.00	0.00	\$0.00	\$0.00
412 International calls that both originate and terminate in foreign points	\$0.00	0%	100%		\$0.00
413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412	\$0.00	0.00	0.00	\$0.00	\$0.00
414 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)	\$5,534,644.00	3.36	95.79	\$185,858.00	\$5,301,908.00
415 Long distance private line services	\$0.00	0.00	0.00	\$0.00	\$0.00
416 Satellite services	\$0.00	0.00	0.00	\$0.00	\$0.00
417 All other long distance services	\$0.00	0.00	0.00	\$0.00	\$0.00
418 Revenues other than U.S. telecommunications revenues. Information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues (See instructions.)	\$13,814,900.00				

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

**2005 FCC Form 499-A Telecommunications Reporting Worksheet**

**Block 4-B: Total Revenue and Uncollectible Revenue Information**

	Total Revenues (a)	Breakouts	
		Interstate Revenues (d)	International Revenues (e)
419 Gross billed revenues from all sources [incl. reseller & non-telecom.] [Lines 303 through 314 plus Lines 403 through 418]	\$19,349,544.00	\$185,858.00	\$5,301,908.00
420 Gross universal service contribution base amounts [Lines 403 through 411 Lines 413 through 417] See Figure 4 in instructions.	\$5,534,644.00	\$185,858.00	\$5,301,908.00
421 Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419	\$0.00	\$0.00	\$0.00
422 Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420	\$0.00	\$0.00	\$0.00
423 Net universal service contribution base revenues [Line 420 minus line 422]	\$5,534,644.00	\$185,858.00	\$5,301,908.00

**Block 5: Additional Revenue Breakouts**

501 Filer 499 ID [from Line 101] 325216  
 502 Legal name of reporting entity [from Line 102] Compass Global, Inc.

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

	Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)
503 Southeast: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands	0 %	0 %
504 Western: Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming	0 %	0 %
505 West Coast: California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island.	0 %	0 %
506 Mid-Atlantic: Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia	0 %	0 %
507 Mid-West: Illinois, Indiana, Michigan, Ohio, and Wisconsin	0 %	0 %
508 Northeast: Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont	100 %	100 %
509 Southwest: Arkansas, Kansas, Missouri, Oklahoma, and Texas	0 %	0 %
510 Total [Percentages must add to 0 or 100.]	100 %	100 %

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

	(a) Total Revenues	(b) Interstate and International
Revenues from resellers that do not contribute to Universal Service	\$ 0	\$ 0

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2005 FCC Form 499-A Telecommunications Reporting Worksheet

Block 6: CERTIFICATION: to be signed by an officer of the filer

601 Filer 499 ID [from Line 101] 826216  
 602 Legal name of reporting entity [from Line 102] Compass Global, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to: Universal Service  TRS  NANPA  LNP Administration

Provide explanation below:

604 Please indicate whether the reporting entity is State or Local Government Entity  I.R.C. § 501Tax Exempt  PUHCA § 34 (a)(1) Exempt

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature  
 607 Printed name of officer First Dean Last Cary  
 608 Position with reporting entity CEO  
 609 Business telephone number of officer ( 201 ) 802-0600 Ext 101  
 610 E-mail of officer deancary@compassglobal.net  
 611 Date 09/04/2007  
 612 Check those that apply:  Original April 1 filing for year  New filer, registration only  Revised filing with updated registration  Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
 For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001



# ALTERNATIVE BILLING ARRANGEMENTS FORM

Line 208 of Form 499-A asks for one billing address and contact person to be used by all four administrators. If your company requires invoices to be sent to different contacts/addresses for the four funds, please use this form. Universal Service Fund invoices will be mailed to the address input on Line 208 of the 499-A itself.

Filer 499 ID: 826216 Legal Name of Carrier: Compass Global, Inc.

<b>TRS- Telecommunications Relay Services Fund Billing Address</b>						
Billing Contact First Name:	<input type="text"/>	Last Name:	<input type="text"/>			
Billing Contact Telephone:	<input type="text"/>	Extension:	<input type="text"/>			
Billing Contact Fax Number:	<input type="text"/>	Billing Contact E-Mail:	<input type="text"/>			
Billing Contact Address:	<input type="text"/>					
	<input type="text"/>					
	<input type="text"/>					
City:	<input type="text"/>	State:	<input type="text"/>	Zip Code:	<input type="text"/>	<input type="text"/>
<b>NANP- North American Numbering Plan Fund</b>						
Billing Contact First Name:	<input type="text"/>	Last Name:	<input type="text"/>			
Billing Contact Telephone:	<input type="text"/>	Extension:	<input type="text"/>			
Billing Contact Fax Number:	<input type="text"/>	Billing Contact E-Mail:	<input type="text"/>			
Billing Contact Address:	<input type="text"/>					
	<input type="text"/>					
	<input type="text"/>					
City:	<input type="text"/>	State:	<input type="text"/>	Zip Code:	<input type="text"/>	<input type="text"/>
<b>LNP- Local Number Portability Fund</b>						
Billing Contact First Name:	<input type="text"/>	Last Name:	<input type="text"/>			
Billing Contact Telephone:	<input type="text"/>	Extension:	<input type="text"/>			
Billing Contact Fax Number:	<input type="text"/>	Billing Contact E-Mail:	<input type="text"/>			
Billing Contact Address:	<input type="text"/>					
	<input type="text"/>					
	<input type="text"/>					
City:	<input type="text"/>	State:	<input type="text"/>	Zip Code:	<input type="text"/>	<input type="text"/>

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

In the Matter of

Request for Review of Decision of the  
Universal Service Administrator by  
Compass Global, Inc.

CC Docket No. 96-45  
WC Docket No. 06-122

AFFIDAVIT OF DEAN CARY  
PRESIDENT OF COMPASS GLOBAL, INC.

Dean Cary, being first duly sworn according to law, does hereby depose and say as follows:

1. I am President of Compass Global, Inc. I have served in that capacity for more than ten years. I have personal knowledge of the events described therein.
2. In June, 2006, Compass Global received a letter from the Investigations & Hearings Division ("IHD") of the FCC's Enforcement Bureau advising the Company that if it was planning to provide or was providing telecommunications services to end-users for a fee, it must register with the Universal Service Fund Administrator. Compass Global did not provide any of the telecommunications services referenced in the letters nor did it provide any services, at all, to "end-users".
3. Compass Global contacted IHD, and over the ensuing months was fully responsive to IHD Staff requests for information. Nothing in this discussion process, however, convinced Compass Global that the nature of its service offering brought it within the universe of carriers which should have registered with USAC and reported revenues via FCC Form 499.
4. IHD Staff indicated that unless the Company filed FCC Forms 499-A and commenced contribution to the funding of federal support mechanisms, a formal investigation would be initiated against it. Therefore, the Company obtained a waiver of the original filing dates for the forms from Mr. Nand Gupta, the FCC's IHD contact person identified as the appropriate

individual to address the Compass Global matter; the waiver effectively extended Compass Global's filing dates for the two forms up to and including September 5, 2006. Compass Global filed original 2005 Form 499-A and original 2006 Form 499-A by that filing deadline.

5. Compass Global began receiving invoices from the various other Fund Administrators the following month, October, 2006, and received its first USAC invoice in January, 2007. Compass Global's January USAC invoice billed the Company contemporaneously and prospectively, based upon its 2006 499-Q data; it also billed amounts retroactively, totaling \$29,613.97 on the January, 2007 bill alone.

6. On January 26, 2007, at the request of USAC personnel, I forwarded to USAC additional hard copies of the original 2005 and 2006 Forms 499-A which had been filed the previous September. At the time of USAC's request for additional hard copies of these documents, Compass Global was not advised that the 2005 Form 499-A purportedly had not been received by USAC.

7. In June, 2007, notwithstanding that Compass Global had complied with IHD's demand that it file Forms 499-A, IHD nonetheless instituted a formal investigation against Compass Global. As a result, the Company retained telecommunications legal counsel and only at that point in time became aware that the revenue data submitted in the Company's original 2005 and 2006 Forms 499-A had been inaccurately reported. At this time, the Company learned it had overpaid, and was presently overpaying, federal support assessments not only to USAC but to each of the federal support funds. It was necessary, therefore, to submit revised Forms 499-A to USAC.

8. Compass Global submitted these revised forms to USAC on September 4, 2007. Compass Global's revised 2005 Form 499-A and revised 2006 Form 499-A were forwarded to USAC by overnight courier on that date and USAC returned "file-stamp" copies evidencing receipt of both the revised 2005 filing and the revised 2006 filing the following day, September 5, 2007.

9. On September 11, 2007, USAC issued a letter to Compass Global in which it unequivocally rejected the revised 2005 Form 499-A.

10. On the same date, by separate letter, USAC advised Compass Global that it was also unequivocally rejecting the Company's revised 2006 Form 499-A.

11. On November 7, 2007, Compass Global appealed both USAC's rejection of the Company's revised 2005 Form 499-A and its rejection of the Company's revised 2006 Form 499-A. In that combined appeal of both rejection decisions, Compass Global specifically noted for USAC the Company's calculation that if USAC persisted in relying upon data reported in the Company's original 2005 Form 499-A -- rather than accepting and processing the revised version of the form -- the Company's liability for federal USF assessments based upon its CY 2004 revenues would exceed amounts rightfully owed by more than \$36,000.

12. Also on November 7, 2007, Compass Global transmitted copies of its USAC Letter of Appeal to the Chief of the FCC's Revenue and Receivables Operations Group and Neustar, Inc., the NECA TRS Collections Department and the Chief Billing and Collection Agent for Welch & Company LLP along with a request that the entities cease all collection efforts during the pendency of the USAC appeal.

13. In January, 2008, while Compass Global's appeal was still pending, the FCC informed the Company that NECA had referred a debt to the FCC for collection.

14. On February 8, 2008, Compass Global appealed this notice of debt transfer, explaining, as it did so that, among other things, the amount identified for collection was inaccurate not only because it failed to take into consideration a \$104,534.37 credit adjustment resulting from USAC's processing of a Revised 2007 FCC Form 499-A, but also because that amount also failed to

take into consideration the 'Appealed' status of USAC denials of Revised 2006 and 2005 Form 499-As.

15. On February 28, 2008, the FCC sent Compass Global a second notice of intent to transfer debt for collection.

16. On March 28, 2008, Compass Global contested this subsequent notice of debt transfer in its second TRS Appeal. The TRS amounts invoiced to Compass Global had been rendered inaccurate at least to some degree by USAC's reporting to NECA of an inaccurate contribution base revenues; thus, USAC's refusal to correct the Company's revenue data effectively precluded an accurate quantification of the amount due NECA, *if any*, by Compass Global. Because the various appeals were thus inextricably intertwined, Compass Global served this second TRS appeal not only upon the FCC and NECA but upon USAC as well.

17. On April 9, 2008, the FCC released a Notice of Apparent Liability ("NAL") for Forfeiture in File No. EB-06-IH-3060. At the time of the issuance of the NAL, USAC had not addressed Compass Global's appeal.

18. On June 6, 2008, Compass Global filed a response to the NAL, in which the Company addressed the far-reaching implications flowing from USAC's refusal to process the Company's revised Form 499-As for 2005 and 2006, and USAC's protracted delay in providing any response to Compass Global.

19. On June 2, 2008, the Administrator's Decision on Contributor's Appeal was issued by the USAC Administrator. Upon receipt of the Administrator's Decision, Compass Global learned for the first time that USAC was attempting to disavow receipt of the Company's original 2005 Form 499-A. The Administrator's Decision also misstated the date upon which the Company's revised 2005 and 2005 Form 499-As were submitted, placing that filing date at

September 7, 2007, despite issuance by USAC of “file-stamps” indicating receipt on September 5, 2007. The Administrator’s Decision also informed Compass Global that, contrary to USAC’s unequivocal rejection of both the original 2005 and 2006 Forms 499-A on September 11, 2007, USAC had actually, without knowledge to Compass Global, unilaterally converted the Company’s revised 2005 Form 499-A filing into a *de facto* original filing, thereafter processing the form and billing Compass Global USF assessments based upon revenue figures provided therein.

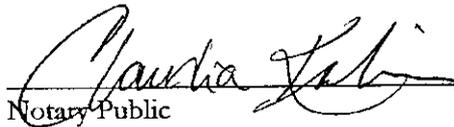
20. Compass Global has reviewed the document USAC admits it posted to its website, “499A – April 2005 Filing”. This document has been altered from its submitted form without the knowledge or consent of Compass Global. Specifically, line 612 of the Form has been altered to reflect the nature of the filing as “Original April 1 filing for the year”. In the document as actually filed by Compass Global, line 612 clearly noted that the filing was a “Revised filing with updated revenue data.”

I affirm under penalty of perjury that the foregoing is true and correct.



\_\_\_\_\_  
Dean Cary

Subscribed and sworn to before me this 30 day of July 2008.



\_\_\_\_\_  
Notary Public

CLAUDIA N. KALINOWSKI  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
My Commission Expires May 10, 2009

VERIFICATION

State of New Jersey        )  
  )  
County of Bergen            )        ss.

I, Dean Cary, being duly sworn according to law, depose and say that I am President of Compass Global, Inc. ("Compass"); that I am authorized to and do make this Verification for it; that the facts set forth in the appeal are true and correct to the best of my knowledge, information and belief. I further depose and say that the authority to submit the notice has been properly granted.

  
\_\_\_\_\_  
Dean Cary

Subscribed and sworn before me this 30 day of July, 2008.

  
\_\_\_\_\_  
Notary Public

CLAUDIA N. KALINOWSKI  
NOTARY PUBLIC  
STATE OF NEW JERSEY  
My Commission Expires May 10, 2009

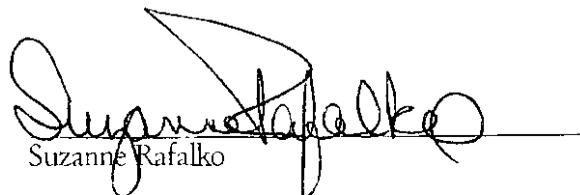
CERTIFICATE OF SERVICE

I, Suzanne Rafalko, hereby certify that true and correct copies of the foregoing Response of Compass Global, Inc., to Notice of Apparent Liability for Forfeiture, were hand-delivered this 31<sup>st</sup> day of July, 2008, to the following:

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
c/o NATEK  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, D.C. 20002  
(via Hand Delivery)

Universal Service Administrator  
Universal Service Administrative Company  
2000 L Street, N.W., Suite 200  
Washington, D.C. 20036  
(via Hand Delivery)

Hillary S. DeNigro, Chief  
Trent B. Harkrader, Deputy Chief  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20005  
(via Hand Delivery)

  
Suzanne Rafalko