

FILE

6



Change the world. One call at a time. SM

February 21, 2007

Docketing Division  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

Re: Case No. 07-68-TP-ACE and TRF No. 90-6369-CT-TRF

Dear Sir/Madam:

Enclosed please find the following from BetterWorld Telecom, LLC:

February 6, 2007 response to Robbin Russell's memo  
February 8, 2007 response to Robbin Russell's memo

Please add these to my submissions from last week.

Do not hesitate to contact me if you have any questions.

Regards,

Gloria Costa  
Manager Regulatory & Admin.  
(703) 797-1750 X909  
[gcosta@BetterWorldTelecom.com](mailto:gcosta@BetterWorldTelecom.com)

RECEIVED-DOCKETING DIV  
2007 FEB 23 PM 2:23  
PUCO

This is to certify that the images appearing are an  
accurate and complete reproduction of a case file  
document delivered in the regular course of business  
Technician JO Date Processed 2-23-07

**MEMORANDUM**

**TO:** Gloria Costa  
Regulatory Manager & Admin.  
11951 Freedom Drive, 13<sup>th</sup> floor  
Reston, VA 20190  
[gcosta@betterworldtelecom.com](mailto:gcosta@betterworldtelecom.com)

**FROM:** Robbin Russell  
Public Utilities Commission of Ohio  
[Robbin.russell@puc.state.oh.us](mailto:Robbin.russell@puc.state.oh.us)

**RE:** In the Matter of the Application of BetterWorld Telecom, LLC to  
Provide Intrastate Inter-exchange Telecommunications Services  
Case No. 07-68-TP-ACE  
Application/Tariff Revisions 1<sup>st</sup> Data Request

**DATE:** February 2, 2007

**DUE:** February 9, 2007

---

After careful review of the BetterWorld Telecom, LLC application several issues need to be addressed before approval can be completed. The issues are as follows:

**Application:**

1. Does BetterWorld Telecom, LCC or any of its affiliates have a certification or have a pending certification in any other state? Please explain.

Yes, we are certified in 16 states and seeking certification in 14 other states.

2. Has BetterWorld Telecom, LCC or any of its affiliates ever been denied certification in any other state? If yes, please explain which states and under what circumstances.

No, BetterWorld Telecom has never been denied certification.

3. BetterWorld Telecom was certified to do business in the State of Ohio on February 24, 2003 (Case No. 03-233-TP-ACE) and was issued Certificate No. 90-6105 on March 4, 2003; however on April 11, 2005, the company filed an application to abandon service (Case No. 05-472-TP-ABN). How has the Company's circumstances changed since 2005 that would warrant the Commission to permit the Company to be re-certified in the State of Ohio.

During that period of time we experienced a change in financing which resulted in a reduction in the number of markets where we could actively sell our services and fully support our customers. BetterWorld Telecom has received a new infusion of capital which will enable us to restart our services in a number of additional states including Ohio.

4. Exhibit C states that the company will "primarily offer services to socially responsible companies/individuals supporting the environment, education, and children." How will the company determine which companies/individuals are socially responsible and supportive of the environment, education, and children? Will the company also offer service to companies/individuals that do not fit these criteria? Please explain.

We will provide service to any person or business that is interested in our service. We do not limit in any way who we offer services. In fact, well over 50% of our existing customers are not socially responsible companies/individuals. However, we have found over the last few years that our market appeal is strongest with companies where we share a common mission. BetterWorld donates 3 percent of our top line revenues to children, education, and the environment. When we identify prospective customers we tend to target prospective customers that share our mission goals. Our sales success rate is much higher in these types of organizations.

**Tariff Revisions:**

5. Page 12, Section 2.7.7 - This is a non-specific service charge, as described in the Competitive Retail Services Rule 22, as such a maximum needs to be included in order for the company to have flexible pricing with regard to this charge.

Revision was made in the tariff. Paragraph pasted below.

- 2.7.7 A charge of not less than \$25.00 or more than \$40.00 will apply whenever a check or draft presented for payment of service is not accepted by the institution on which it is written.

**When you file your corrections please make certain that the "Issued Date" in the lower left corner of each tariff sheet reflects that date on which you file the corrections. I must reject your filing if you fail to do this.**

This case is scheduled to go automatic on February 23, 2007; therefore it is important to return these revisions as soon as possible to avoid suspension.

If you have any questions, feel free to call me at (614) 466-0401 or email me at the above address.

## **MEMORANDUM**

**TO:**           **Gloria Costa**  
                  **Regulatory Manager & Admin.**  
                  **11951 Freedom Drive, 13<sup>th</sup> floor**  
                  **Reston, VA 20190**  
                  **gcosta@betterworldtelecom.com**

**FROM:**       **Robbin Russell**  
                  **Public Utilities Commission of Ohio**  
                  **Robbin.russell@puc.state.oh.us**

**RE:**           **In the Matter of the Application of BetterWorld Telecom, LLC to**  
                  **Provide Intrastate Inter-exchange Telecommunications Services**  
                  **Case No. 07-68-TP-ACE**  
                  **Application/Tariff Revisions - 2<sup>nd</sup> Data Request**

**DATE:**       **February 8, 2007**

**DUE:**        **February 12, 2007**

---

After careful review of the BetterWorld Telecom, LLC response to the 1<sup>st</sup> Data Request, received via email on February 6, 2006, there are a few additional issues that need to be addressed before approval can be completed. The issues are as follows:

**Application:**

1. **Please provide a list of the 16 states in which BetterWorld Telecom, LLC or any of its affiliates have a certification.**

There are 18 states now.

Virginia

Maryland

California

Florida

New York

West Virginia

Arizona

Wisconsin

North Carolina

Illinois

Georgia

Texas

South Carolina

Delaware  
Tennessee  
New Mexico  
New Hampshire  
North Dakota

**Tariff Revisions:**

2. **Page 12, Section 2.7.7** - This is a non-specific service charge, as described in the Competitive Retail Services Rule 22, as such a maximum needs to be included in order for the company to have flexible pricing with regard to this charge. The new proposed language does not specifically state what the current charge is for a returned check. The Company might also want to consider placing the actual charge in the Section 4 - Rates and Charges instead of in the body of the tariff. Below is sample language:

"A charge will apply whenever a check or draft presented for payment of service is not accepted by the institution on which it is written. The maximum the Company may charge is \$40. For the actual current charge please see Section 4 – Rates and Charges."

Here is the new section:

2.7.7 A charge will apply whenever a check or draft presented for payment of service is not accepted by the institution on which it is written. The maximum the Company may charge is \$40. For the actual current charge please see Section 4 – Rates and Charges.

4.4 Return Check Charge

The following charge will apply whenever a check or draft presented for payment of service is not accepted by the institution on which it is written.

4.4.1 Rate	\$25.00
------------	---------

3. **Page 19, 4.1.1** – Is the Company charging the end-user \$2 to receive the initial paper bill? If so, a company cannot charge the end-user for the initial paper bill. However, a company may offer end-users a discount for opting not to receive a paper bill.

It is 3.99 for an ebill, and 5.99 for a paper bill. I changed the section to read as follows:

February 21, 2007

4.1.1 Monthly Service Charge

\$3.99 ebill

\$5.99 paper bill

**When you file your corrections please make certain that the "Issued Date" in the lower left corner of each tariff sheet reflects that date on which you file the corrections. I must reject your filing if you fail to do this.**

This case is scheduled to go automatic on February 23, 2007; therefore it is important to return these revisions as soon as possible to avoid suspension.

If you have any questions, feel free to call me at (614) 466-0401 or email me at the above address.