

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of)	Case No. 06-1345-TP-ORD
)	Case No. 08-0828-TP-ATA
Application of STi Prepaid, LLC to Detariff Certain Tier 2)	TRF Docket No. 90-6372
Services and Request for Wavier)	
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STI PREPAID, LLC REQUEST FOR WAVIER

STi Prepaid, LLC (“STi Prepaid”), by its attorneys, respectfully submits this Request for Waiver of Rule 4901:1-6-5(G)(1), O.A.C. (“Detariffing Rule”) adopted by the Public Utilities Commission of Ohio (“Ohio”) in its June 6, 2007 Opinion and Order in Case No. 06-1345-TP-ORD. STi Prepaid seeks a Commission waiver of the Detariffing Rule in order to file a tariff for casual calling or 10-10 dial-around services. The Commission has previously indicated that it would consider waiver requests, on a company-specific basis, for casual calling services.¹ This request is similar to the waivers requested by various AT&T and Verizon affiliates.

STi Prepaid is authorized to provide resold intrastate interexchange services in Ohio pursuant to the Commission’s order in Case No. 07-0318-TP-ACE. In addition to its 10-10 dial-around services, STi Prepaid also provides prepaid calling card services in Ohio. STi Prepaid’s tariff (PUCO 1) includes both prepaid calling card and casual calling services. STi Prepaid only files this request for waiver with respect to its casual calling services. STi Prepaid will detariff any tariff provisions relating to prepaid calling card services.

¹ Case No. 06-1345-TP-ORD, Entry on Rehearing, at 7 (Aug. 1, 2007).

STi Prepaid's casual calling services allow Ohio consumers to make long distance telephone calls on a dial-around basis. These services do not require the calling party to establish an account with STi Prepaid before the services are offered. In fact, STi Prepaid's dial-around service can be used by any person at any time from any location simply by dialing the specified access code prior to making a telephone call. STi Prepaid has no knowledge of the identity of the persons that utilize its dial-around services (charges are placed on consumers' local exchange carrier bill by a third party billing and collection vendor). Because there is no advance contractual relationship, STi Prepaid will not have an opportunity to advise these consumers of the rates, terms, and conditions that will apply to their use of the 10-10 service. Thus, allowing STi Prepaid to maintain the portions of its tariff relating to casual calling is the simplest and most efficient means of establishing a contractual relationship between STi Prepaid and casual callers.

The Federal Communications Commission ("FCC") has also recognized that dial-around service providers "do not have established business relationships" with the users of their services.² For this reason, the FCC determined that casual calling services should not be detariffed because it understood the difficulties in establishing a contract with consumers using casual calling services.³

² *Rules and Regulations Implementing Minimum Customer Account Record Exchange Obligations on All Local and Interexchange Carriers*, 19 FCC Rcd 5688, ¶ 19 (2004).

³ *Policy and Rules Concerning the Interstate, Interexchange Marketplace*, 12 FCC Rcd 15014, ¶¶ 32-33 (1997).

Accordingly, STi Prepaid respectfully requests that the Commission grant its request for waiver of the Detariffing Rule with respect to STi Prepaid's casual calling services.

Respectfully submitted,

STI PREPAID LLC



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Its Attorneys

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Summary: Application Request for Wavier electronically filed by Angela F Collins on behalf of STi Prepaid, LLC