



June 1, 2007

Sara B. Greff
Sara.Greff@woodsfuller.com

Via E-Mail Transmission

Ms. Patty VanGerpen
Public Utilities Commission
500 East Capitol
Pierre, SD 57501

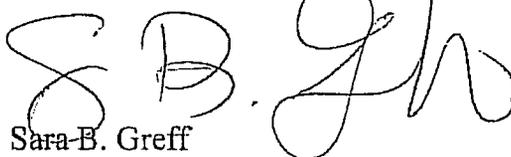
RE: CSDVRS, LLC Application for Certificate of Authority

Dear Patty:

Enclosed for your consideration is the original of an Application for Certificate of Authority on behalf of CSDVRS, LLC. Our check in the sum of \$250.00 for the filing fee is being sent by first class mail.

Very truly yours,

WOODS, FULLER, SHULTZ & SMITH P.C.


Sara B. Greff

Enclosures

**Before the South Dakota
Public Utilities Commission
Pierre, SD 57501**

In re)
)
CSDVRS, LLC)
)
For certificate of authority with the commission)
pursuant to SDCL 49-31-3 for interexchange service)

CSDVRS, LLC submits this application for certificate of authority from the State of South Dakota Public Utilities Commission in order to become eligible for reimbursement from the Interstate Telecommunications Relay (TRS) Fund as a Video Relay Service provider.

I. Introduction

CSDVRS, LLC

CSDVRS, LLC is a Delaware limited liability company with its principal place of business at 600 Cleveland Street Suite 1000 Clearwater, Florida 33755. CSDVRS, LLC was formed in 2006 to provide video relay service (VRS). Upon formation CSDVRS, LLC acquired the Video Relay Service operations from Communication Service for the Deaf, Inc. which had operated the Video Relay Service for over 5 years.

CSDVRS, LLC Video Relay Service

CSDVRS, LLC provides VRS through the use of high speed Internet and the public switched network enabling the deaf and hard of hearing to make telephone calls to a hearing person through the assistance of a video interpreter. CSDVRS, LLC operates 24 hours a day, seven days a week. CSDVRS, LLC Video Relay Service can be accessed at this IP address through most videoconferencing units: *csdvrs.com and csdvrs.tv*.

II. South Dakota Public Utilities Commission Certificate of Authority Application

(1) The name, address, and telephone number:

**CSDVRS, LLC
600 Cleveland Street Suite 1000
Clearwater, Florida 33755
727-254-5600**

(2) The name under which the applicant will provide these services if different than in subdivision (1) of this section:

CSDVRS, LLC

(3) If the applicant is a corporation:

Not applicable

(a) The state in which it is incorporated, the date of incorporation, and a copy of its certificate of incorporation or, if it is an out-of-state corporation, a copy of its certificate of authority to transact business in South Dakota from the Secretary of State;

(b) The location of its principal office, if any, in this state and the name and address of its current registered agent; and

(c) The name and address of each corporation, association, partnership, cooperative, or individual holding a 20 percent or greater ownership or management interest in the applicant corporation and the amount and character of the ownership or management interest;

(4) If the applicant is a partnership, the name, title, and business address of each partner, both general and limited;

**Sean Belanger, President, 600 Cleveland Street #1000, Clearwater, FL-Partner
M/C Ventures Partners, 75 State Street, Boston, MA-Partner
Communication Service for the Deaf, Inc., 102 N Krohn Place, Sioux Falls, SD-Partner
Providence Equity LLP, 390 Park Avenue 4th Floor, New York, NY**

CSDVRS, LLC has obtained a Certificate of Authority to transact business in South Dakota. A copy of the Certificate of Authority is attached. See Exhibit 1.

(5) A description of the telecommunications services the applicant intends to offer;

Video Relay Service for the Deaf and Hard of Hearing. CSDVRS, LLC currently provides Video Relay Service through a contract agreement with Sprint/United Management Company which will be expiring June 2007.

(6) A detailed statement of the means by which the applicant will provide its services;

Video Relay Service (VRS)- CSDVRS, LLC provides VRS through the use of high speed Internet and the public switched network enabling the deaf and hard of hearing to make and receive telephone calls to a hearing person through the assistance of a video interpreter. A deaf or hard of hearing user uses sign language to call our Video Interpreter by using a video connection. The Video Interpreter calls the hearing individual on a standard telephone and relays the conversation between both parties. The process

involves two distinct calls-the video connection to the Video Interpreter and an outgoing standard telephone call. These two calls are not connected physically but is connected through the Video Interpreter relaying the messages. CSDVRS, LLC operates 24 hours a day, seven days a week. CSDVRS, LLC Video Relay Service can be accessed at this IP address: *csdvrs.com* or *csdvrs.tv*. Hearing individuals may also wish to call the deaf or hard of hearing consumer using a toll-free number.

CSDVRS, LLC's network is as follows: Deaf users connect to CSDVRS through a broadband connection that they subscribe to from their local ISP. Internally once CSDVRS receives the connection, it enters the internal CSDVRS network which is comprised of a ATM network which connects all CSDVRS locations and agents. Once a CSDVRS agent receives the video call, the agent connects to the PSTN via a broadband connection to various telecommunications carriers. See attached Exhibit 2, diagrams of network.

CSDVRS, LLC is currently providing only VRS services. All calls to CSDVRS, LLC terminate at our facility. Our agents place outgoing calls originating from our facility and terminating at incoming users requested phone number. It is not providing any traditional local interexchange services or intrastate long distance service to individuals in South Dakota. CSDVRS, LLC does provide VRS service for individuals in South Dakota, assisting them to make calls within the state and outside the state. CDVRS, LLC may be providing VRS services that originate and terminate in the same local exchange, local service territory and rural telecommunications companies. The services would all be VRS in nature and not that of a typical telecommunications service. As previously stated, VRS services are broadband in nature, which has been classified by the FCC as interstate services.

(7) The geographic areas in which the services will be offered or a map describing the service area;

Nationwide

(8) Current financial statements of the applicant including a balance sheet, income statement, and cash flow statement; a copy of the applicant's latest annual report; a copy of the applicant's report to stockholders; and a copy of applicants' tariff with the terms and conditions of service;

CSDVRS, LLC started operation December 14, 2006. We have attached the 2 week financials for the year ending December 31, 2006 plus we have attached the current financials through April 2007. See Exhibit 3. This information is being filed confidentially and CSDVRS requests confidential treatment pursuant to ARSD 20:10:01:40. CSDVRS requests the information be afforded permanent confidential treatment. Any inquiries to this request for confidentiality can be directed to:

Mike Strecker, Controller
600 Cleveland Street Suite 1000
Clearwater, Florida 33755
T. 727-254-5600
F. 727-443-1537
E. mstrecker@csdvrs.com

The information CSDVRS, LLC is requesting confidential status for is proprietary in nature and disclosure would result in material damage to CSDVRS, LLC's financial or competitive position.

End users of CSDVRS, LLC services are not bound to the company by a term contract and can stop using our service at any time without any penalty; and CSDVRS, LLC Video Relay Services are provided in accordance to FCC Telecommunications Relay Service regulations. CSDVRS, LLC is currently reimbursed through the contract agreement with Sprint/United Management Company. CSDVRS, LLC desires to be able to be reimbursed directly from the Interstate TRS Fund in the near future.

CSDVRS, LLC is aware that the Commission may, in instances, where a company provides weak or no financial statements, put restrictions on certificates of authority. CSDVRS, LLC feels the financial information provided is sufficient. However, should the Commission feel different, CSDVRS, LLC would accept restrictions on its Certificate of Authority from offering any prepaid services, collecting customer deposits or collecting any advanced payments.

(9) The names, addresses, telephone number, fax number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer billings and customer service matters;

Mike Strecker, Controller
600 Cleveland Street Suite 1000
Clearwater, Florida 33755
T. 727-254-5600
F. 727-443-1537
E. mstrecker@csdvrs.com

Mr. Strecker will be acting as the registered agent for CSDVRS, LLC.

Customer billing complaints is inapplicable as the end user of CSDVRS, LLC services will not be billed. For customer service matters, the complaint procedure for CSDVRS, LLC begins with a submission through the customer service section on its web site, www.csdvrs.com. A complaint can also be received by a customer representative at 800-296-3808 or via fax at 727-443-1537. We also can be reached by e-mail: help@csdvrs.com. If one wishes to write a letter, the mailing address is CSDVRS, LLC, 600 Cleveland Street Suite 1000, Clearwater, Florida 33755

The customer service department handles all types of complaints: technical, operational, industry, and miscellaneous. Each complaint is tagged open until resolution or the point of no possible future action has been reached, e.g., a complaint on VRS reimbursement rate that has been copied to the FCC. Technical and operational complaints are managed in-house with the technical and operational point-of-contacts reviewing and following up on every individual complaint. Industry complaints are forwarded to the appropriate agency, the FCC in most instances.

CSDVRS, LLC will make every attempt to ensure that all complaints are followed up on by the next business day.

(10) A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if applicable;

CSDVRS, LLC is not registered or certified to provide telecommunications services to any state and therefore has never been denied registration or certification in any state.

(11) A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services;

Due to their unique natures, the provisions of CSDVRS, LLC Video Relay Service is geared for the deaf and hard of hearing population. CSDVRS, LLC markets to the deaf and hard of hearing primarily through outreach specialists located around the country. Marketing is also supported by participation in and sponsorships of select tradeshows targeting the deaf and hard of hearing. CSDVRS, LLC does not engage in any multi-level marketing. Copies of brochures are enclosed with this application. See Exhibit 4.

(12) Cost support for rates shown in the company's tariff for all noncompetitive or emerging competitive services;

CSDVRS, LLC provides Video Relay Service through a contract agreement with Sprint/United Management Company and is totally reimbursed by FCC regulated National Exchange Carrier Association Telecommunication Relay Service (TRS) fund. The FCC has developed minimum standards with which every relay provider must comply. Non-compliance will result in the inability to be reimbursed from the TRS Fund.

CSDVRS, LLC does not provide traditional interexchange telephone services that are charged to end-user customers and we hereby request a waiver from filing a tariff in accordance with ARSD 20:10:24:02(15). CSDVRS, LLC agrees that we will not offer any

telecommunication services that requires payment directly from the end-user customer.

(13) Federal tax identification number;

FEIN: 20-5985901

(14) The number and nature of complaints filed against the applicant with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered;

None

(15) A written request for waiver of those rules the applicant believes to be inapplicable; and

None

(16) Other information requested by the commission needed to demonstrate that the applicant has sufficient technical, financial, and managerial capabilities to provide the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws.

CSDVRS, LLC has sufficient technical, financial and managerial capabilities to offer this service. Many top-level employees have joined our company from the previous provider and have many years of experience in Video Relay Service. See the attached organization chart of the company.

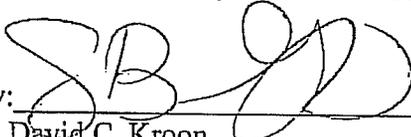
CSDVRS, LLC does not have a South Dakota sales tax license as it does not receive any payment for services or products from residents of South Dakota.

Attached for your convenience is a copy of the recent FCC Report and Order addressing the issues of certification and oversight of VRS. See Exhibit 5, *In the Matter of Telecommunications Relay Services and Speech-to-Speech for Individuals with Hearing and Speech Disabilities*, FCC 05-203, Released December 12, 2005.

WHEREFORE, CSDVRS respectfully requests the Commission to grant its application for certificate of authority, giving CSDVRS the authority to provide interexchange public telecommunications service.

Dated this 1ST day of June, 2007.

WOODS, FULLER, SHULTZ & SMITH

By: 

David C. Kroon

Sara B. Greff

300 South Phillips Avenue, Suite 300

P.O. Box 5027

Sioux Falls, SD 57117-5027

(605) 336-3890

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 1ST day of June, 2007, she e-mailed a true and correct copy of the above and foregoing Application for Certificate of Authority by electronic submission to the Public Utilities Commission.

WOODS, FULLER, SHULTZ & SMITH

By: 