

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE)	
APPLICATION OF)	
COMBINED PUBLIC COMMUNICATIONS, LLC)	
)	Docket No.
FOR A CERTIFICATE OF AUTHORITY)	
TO PROVIDE INTEREXCHANGE)	
TELECOMMUNICATIONS AND)	
OPERATOR SERVICES IN SOUTH DAKOTA)	

APPLICATION

Application is hereby made to the South Dakota Public Utilities Commission (the "Commission") pursuant to ARSD 20:10:24:02 and 20:10:24:05 for an Order granting Combined Public Communications, LLC ("Applicant" or "Combined Public") a Certificate of Authority to Provide Interexchange Telecommunications and Operator Services in the State of South Dakota ("Application"). The following information is furnished in support thereof:

- (1) **The Applicant's name, address, telephone number, facsimile number, web page URL and E-mail address;**

Combined Public Communications, LLC
100 Aqua Drive, Cold Spring, Kentucky 41076
Telephone: (877) 998-5678
Facsimile: (850) 392-1695
Toll-Free Customer Service: (877) 998-5678
Web Page: www.cpcjail.com
E-mail Address: regulatory@combinedpublic.com

(2) A description of the legal and organizational structure of the Applicant's company;

The Applicant is a Delaware limited liability company that was originally incorporated in Ohio on November 29, 1994 as M&M Payphones, Inc. The corporate name was changed to Combined Public Communications, Inc. on March 24, 2000. On November 21, 2016 Combined Public converted to a Delaware corporation and subsequently a Delaware limited liability company. A copy of the Applicant's formation documents, as amended, are attached hereto as **Exhibit A**. Combined Public is a wholly owned subsidiary of Client Telephone Solutions, LLC a Delaware limited liability company.

(3) The name under which Applicant will provide interexchange services if different than in subdivision (1) of this section;

Not applicable, Applicant will provide services under Combined Public Communications, LLC.

(4) A copy of the Applicant's certificate of authority to transact business in South Dakota from the Secretary of State;

A copy of Applicant's Certificate of Authority to transact business as a foreign limited liability company in the State of South Dakota is attached hereto as **Exhibit B**.

(5) The location of the Applicant's principal office, if any, in this state and the name and address of its current registered agent, if applicable;

The Applicant has no principal office in South Dakota. The name and address of the Applicant's current registered agent is:

Incorp Services, Inc.
400 North Main Avenue, Suite 206
Sioux Falls, South Dakota 57104

(6) A list and specific description of the telecommunications services the applicant intends to offer;

Combined Public proposes to provide calling services to inmates of confinement institutions throughout the state of South Dakota. Combined Public will bill via credit card, collect calls and through 800 access calls.

(7) A detailed statement of how the Applicant will provide its services;

Applicant does not own or maintain any transmission facilities or switching equipment in the State of South Dakota. The Applicant will provide services through its underlying carriers utilizing facilities provided by Qwest or other facilities-based carriers. As a reseller, Applicant has no point of presence in the State of South Dakota, thus Applicant neither owns, leases, nor operates any switching, transmission, or other physical facilities in the State of South Dakota, and no such facilities will be used by Applicant in providing service in the State of South Dakota.

(8) A service area map or narrative description indicating with particularity the geographic area proposed to be served by the applicant;

Applicant intends to provide services on a statewide basis.

- (9) **For the most recent 12 month period, financial statements of the Applicant including a balance sheet, income statement, and cash flow statement. The Applicant shall provide audited financial statements, if available;**

Applicant's financial statements for the most recent 12 month period are attached hereto as **Exhibit C**.

- (10) **The names, addresses, telephone number, facsimile 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 service matters;**

All inquiries regarding regulatory matters should be addressed to:

Joshua T. Welk, CFO
100 Aqua Drive
Cold Spring, Kentucky 41076
Toll-Free Telephone: (877) 998-5678
Phone: (877) 998-5678
Facsimile: (850) 392-1695
E-Mail: regulatory@combinedpublic.com

All inquiries regarding complaints should be addressed to:

Vicky Moody, Regulatory Manager
100 Aqua Drive
Cold Spring, Kentucky 41076
Toll-Free Telephone: (877) 998-5678
Phone: (877) 998-5678
Facsimile: (850) 392-1695
E-Mail: regulatory@combinedpublic.com

Applicant's customer service department may be contacted via a toll-free number. The Company will maintain a Customer Service Department exclusively for Customer's questions, requests for service, complaints and trouble handling. The Applicant's Customer Service address and toll free number will be printed on the Customer's bill.

Customer Service Representatives will be available 8:00 A.M. to 5:00 P.M. standard time Monday through Friday. After hours, and on holidays, Customers will be automatically forwarded to an answering service for messaging and paging. If the customer is not satisfied with the complaint resolution, customer will be advised it can contact the Commission for resolution.

(11) Information concerning how the Applicant plans to bill and collect charges from customers;

Combined Public will bill via credit card, collect calls and through 800 access calls.

(12) Information concerning the Applicant's policies relating to solicitation of new customers and a description of the efforts the applicant shall use to prevent the unauthorized switching of interexchange customers;

Combined Public will not be offering traditional interexchange service. Combined Public proposes to provide automated collect and prepaid calling services to inmates of confinement institutions throughout the state of South Dakota.

(13) Information concerning how the Applicant will make available to any person information concerning the Applicant's current rates, terms, and conditions for all of its telecommunications services;

The Applicant will make available to any person information concerning the Applicant's current rates, terms, and conditions for all of its telecommunications services through a toll-free telephone number.

- (14) **Information concerning how the Applicant will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer. The notification must be made at least thirty days in advance of the change;**

The Applicant will notify a customer of any materially adverse change to any rate, term, or condition of service being provided through either an automated message or notice to correctional facility. The notification will be made at least thirty days in advance of the change.

- (15) **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;**

Combined Public specializes in the provision of inmate communications services and has appropriate state certifications in Alabama, Colorado, Florida, Georgia, Indiana, Iowa, Kansas, Kentucky, Mississippi, Missouri, Nebraska, North Carolina, Ohio, South Carolina, Tennessee, and Wyoming. The Applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified. The Applicant has never been denied registration or certification in any state.

- (16) **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;**

Applicant intends to market its services to confinement institutions to include but limited to county jails, holding facilities, and prisons. Applicant does not intend to engage in multilevel marketing. Applicant's marketing materials are currently being developed and are not available at this time.

(17) Federal tax identification number and South Dakota sales tax number;

Applicant's Federal tax identification number is 31-1421854. Applicant's South Dakota sales tax number is 1033-1080-ST. A copy of the sales tax license attached hereto as

Exhibit D.

(18) 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.

WHEREFORE, the undersigned Applicant requests that the South Dakota Public Utilities Commission enter an order granting this Application.

DATED: September 10, 2019

Respectfully submitted,




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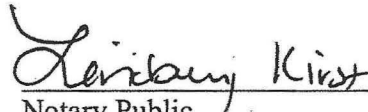
Joshua Welk, being first duly sworn, deposes and says that he is the CFO of Combined Public Communications, LLC, the Applicant in the proceeding entitled above, that he has read the foregoing Application and knows the contents thereof; that the same are true of his knowledge, except as to matters which are therein stated on information or belief, and to those matters he/she believes them to be true.



Joshua Welk
Combined Public Communications, LLC

Sworn to and Subscribed before me, the undersigned Notary Public, on this 30th day of August, 2019.

(SEAL)



Notary Public

Lindsay Kirst

Print or Type Name

My Commission Expires: 5/9/22

LINDSAY KIRST
NOTARY PUBLIC
Kentucky, State At Large
I.D. # 600808
My Commission Expires 5/9/2022