

Sterling

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VIA PRIORITY MAIL
August 12, 2020

Public Utilities Commission
Capitol Building, 1st floor
500 E. Capitol Ave.
Pierre, SD 57501

In Re: Easton Telecom Services, L.L.C. –
Application for Certificate of Authority for Local Exchange Services in South Dakota

To the South Dakota Public Utilities Commission -

This office represents Easton Telecom Services I.J.C. ("Easton") and in this role, submits the following application. Specifically, Easton applies for a certificate of authority for local exchange services from the South Dakota Public Utilities Commission (the "Commission") and provides the following information in furtherance of the application.

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

Easton Telcom Services L.L.C.
Summit II
3046 Brecksville Road, Unit A
Richfield, OH 4428
P: 330.659.6700
F: 330.659.9379
www.eastontel.com
jkolezynski@eastontelecom.com

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

The Applicant is formed in the State of Ohio as a limited liability company. The following parties are the only Members/owners of the Company:

Heidi Mocas	-	50.0%
Robert E. Mocas	-	50.0%

(3) *The name under which applicant will provide local exchange services if different than in subdivision (1) of this section;*

N/A

(4) *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 does not have a physical office in South Dakota. The Applicant has been authorized to transact business in the State of South Dakota since 2001 and the Applicant's Registered Agent is:

CT Corporation System
319 S. Coteau St.
Pierre, SD 57501-3187

(5) *A copy of its certificate of authority to transact business in South Dakota from the secretary of state;*

Please see a copy of a Certificate of Good Standing for Easton Telecom Services LLC issued by the South Dakota Secretary of State on August 12, 2020, which appears as Attachment 5.

(6) *A description of the applicant's experience providing any telecommunications services in South Dakota or in other jurisdictions, including the types of services provided, and the dates and nature of state or federal authorization to provide the services;*

Easton has been granted a Certificate of Authority from the Commission by order dated October 20, 2010 in Docket Number TC10-085, a copy of which appears as Attachment 6.

(7) *Names and addresses of applicant's affiliates, subsidiaries, and parent organizations, if any;*

N/A

(8) *A list and specific description of the types of services the applicant seeks to offer and how the services will be provided including:*

a) *Information indicating the classes of customers the applicant intends to serve;*

Applicant seeks to provide twenty-four hour per day competitive resold local exchange services within South Dakota. Resold Long-distance, interstate services between points of origin within the State of South Dakota to all points in the contiguous United States, Alaska, Hawaii and the U.S. Virgin Islands. Applicant proposes to provide its services to all equal access areas in the state.

Applicant will provide resale services to business customers. As market conditions warrant, Applicant may also provide services wholesale to other resellers and carriers.

b) *Information indicating the extent to and timeframe by which applicant will provide service through the use of its own facilities, the purchase of unbundled network elements, or resale;*

Applicant intends to provide service immediately upon receiving certification as a reseller.

c) *A description of all facilities that the applicant will utilize to furnish the proposed local exchange services, including any facilities of underlying carriers; and*

Applicant does not own or control facilities within the State of South Dakota.

- d) *Information identifying the types of services it seeks authority to provide by reference to the general nature of the service;*

Applicant seeks authority to provide all forms of local exchange service.

- (9) *A service area map or narrative description indicating with particularity the geographic area proposed to be served by the Applicant;*

The Applicant intends to provide local exchange services in the service areas of CenturyLink QC ("Qwest").

- (10) *Information regarding the technical competence of the applicant to provide its proposed local exchange services including:*

- a) *A description of the education and experience of the applicant's management personnel who will oversee the proposed local exchange services; and*

Robert E. Mocas, General Manager

63 years old. BA in 1979 and post-graduate studies. Entered telecom industry in 1983 as Consultant Trainee. Became Senior Vice President in 1988. Left firm in 1992 to found Resale LO Company. Operated successfully as President for 7 years. Sold the company in 1999, remained as Vice President of parent firm and operated as subsidiary profitably. Organized Weston Telecommunications, LLC, now known as Easton Telecom Services, L.L.C. to purchase assets of Easton Telecom Services, Inc. in 2001.

Jim Kolezynski, Director of Operations

67 years old. 47 years of experience in industry. MBA, BA in Business Administration; Associate in Accounting. Has held managerial positions in various disciplines including Accounting, Sales, Marketing and Business Development. Previously with SBC/Ameritech, Ohio Bell, and AT&T.

Samantha Macke, Controller

41 years old, employed at Easton since 2018. BA in 2000, MBA expected May of 2021. 15 years of experience in accounting, financial analysis, and tax compliance. Previously with the Better Business Bureau.

James W. Butler, Director of Sales and Marketing

53 years old. 32 years of experience in industry. Employed by Easton since September 1992. Previously the Manager of Support Services. Previous experience in outside sales for LOOS, Allnet and Conquest Communications.

Denise L. Stoppenhagen, Director of Network Services

55 years old. 31 years of experience in industry. Employed by Easton since 1994. BA in 1987. Previously with Progressive Communication Technologies as Manager of Complex Local Networks Local/Data/Equipment/LO and Disaster Recovery.

Dawna R. Kornick, Director of Support & Local Network Services

62 years old. 33 years of experience in industry. Employed by Easton since 1995. Previously with BN1 Telecommunications where she held several different positions including Marketing Support Rep., Account Coordinator, Provisioning & Customer Service.

- b) *Information regarding policies, personnel, or arrangements made by the applicant which demonstrates the applicant's ability to respond to customer complaints and inquiries promptly and to perform facility and equipment maintenance necessary to ensure compliance with any commission quality of service requirements;*

Customer service representatives will handle all initial customer disputes. A representative may escalate the resolution of a dispute internally or refer the customer to the Commission. Customers may reach a representative by calling 1-800-222-8122.

Customers can call the Company's toll-free number to report problems. If the problem is determined to involve leased facilities, Customer Service Representatives will contact any relevant underlying carrier(s) upon whom the Company relies for maintenance and repair of network fault(s) affecting service.

Applicant understands the importance of effective customer service for local service customers and has made arrangements for its customers to call the company at its toll-free customer service number. The toll-free number will be printed on the customer's monthly billing statements. A customer who is dissatisfied with the resolution offered by a supervisor will be referred to the South Dakota Public Utilities Commission.

- (11) *Information explaining how the applicant will provide customers with access to emergency services such as 911 or enhanced 911, operator services, interexchange services, directory assistance, and telecommunications relay services;*

Services will be provided through the Applicant's underlying carrier.

- (12) *For the most recent 12-month period, financial statements of the applicant consisting of balance sheets, income statements, and cash flow statements. The applicant shall provide audited financial statements, if available;*

Please see the Applicant's financial statements for 2019 provided as Attachment 12.

- (13) *Information detailing the following matters associated with interconnection to provide proposed local exchange services:*
a) *The identity of all local exchange carriers with which the applicant plans to interconnect;*

The Applicant plans to interconnect with Qwest.

- b) *The likely timing of initiation of interconnection service and a statement as to when negotiations for interconnection started or when negotiations are likely to start; and*

Applicant anticipates negotiating the interconnection agreements concurrent with the processing of this Application.

- c) *A copy of any request for interconnection made by the applicant to any local exchange carrier;*

Applicant anticipates negotiating the interconnection agreements concurrent with the processing of this Application.

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

The Applicant will utilize an independent sales channel to market the Applicant's services to end-users in South Dakota. The Applicant provides services in 45 States and utilizes an independent sales channel for all of its sales. The Applicant does not engage in multi-level marketing to market its services and the Applicant does not have brochures to market its services.

(15) If the applicant is seeking authority to provide local exchange service in the service area of a rural telephone company, the date by which the applicant expects to meet the service obligations imposed pursuant to § 20:10:32:15 and applicant's plans for meeting the service obligations;

N/A

(16) 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;

The Applicant has never been denied registration or certification, and the Applicant is registered or certified to provide services in 45 States. The Applicant is in good standing in each State on with each State utility commission.

(17) The names, addresses, telephone numbers, E-mail addresses, and facsimile numbers of the applicant's representatives to whom all inquiries must be made regarding customer complaints and other regulatory matters;

Customer Complaints:

Dawna R. Kornick
Director of Customer Support & Local Service
Easton Telecom Services, LLC
Summit II
3046 Brecksville Rd., Unit A
Richfield, OH 44286
P: 330.659.6700
F: 660.659.XXXX
dkornick@eastontel.com

Regulatory Matters:

Jim Kolezynski
Director of Operations
Easton Telecom Services, LLC
Summit II
3046 Brecksville Rd., Unit A
Richfield, OH 44286
P: 330.659.6700
F: 660.659.XXXX
jkolezynski@eastontel.com

(18) Information concerning how the applicant plans to bill and collect charges from customers who subscribe to its proposed local exchange services;

Applicant will schedule monthly billing to its customers. Payment is due by the invoice date printed on the bill. The Applicant may impose a late charge of 1.5% per month (or lower if required by State law) on any delinquent accounts.

(19) 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 local service customers by the applicant, its employees, or agents;

Applicant will not change a customer's service without first confirming the order through one of three verification processes established by the FCC.

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

Applicant has not received complaints with any State or Federal regulator commission regarding the unauthorized switching of a customer's telecommunications provider or for the act of charging customers for services that have not been ordered.

(21) 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 post its Services Price List at its website, specifically at: <http://www.eastontel.com/customer-resources>. Upon a change in Prices, the Applicant will notify its customers via bill insert or online notification of an update to the Price Lists.

(22) 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 provide written notice to customers for changes in rates, terms, or conditions of service offerings.

(23) A written request for waiver of those rules believed to be inapplicable;

The Applicant requests that the Commission waive any rules that are not applicable to the Applicant or to the services to be provided by the Applicant.

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

Federal Tax ID: 34-1961773
South Dakota Sales Tax No.: 73-001-341961773E-ST-001

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

The Applicant is willing and able to provide the Commission with any additional information required by the Commission to demonstrate the Applicant's technical, financial, and managerial capabilities to provide local exchange services consistent with the requirements of applicable rules and laws.

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Thank you for the opportunity to submit this Application and you may contact this office with all matters that pertain to this Application.

Respectfully Submitted,



Philip Josephson
FOR EASTON TELECOM SERVICES LLC

cc: Easton Telecom Services

Encl.: Certificate of Authority - SOS
Certificate of Authority - PUC
Financial Statements - 2019