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**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Colleen King
202.719.7307
cking@wileyrein.com

February 27, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Section 63.71 and 63.19 Application of Telecom Argentina USA, Inc. For Authority Pursuant to Section 214 of the Communications Act of 1934, to Discontinue the Provision of Service, WC Docket No. 14-26

Dear Ms. Dortch:

Telecom Argentina USA, Inc. ("Telecom Argentina USA"), by counsel, supplements the above-referenced application to discontinue the provision of retail telecommunications services. As described below, Telecom Argentina USA has provided copies of its discontinuance application to commissions and governors in several additional states. Telecom Argentina USA has now provided copies of the application to all states.

As described in the pending application, Telecom Argentina USA's pre-paid calling cards are distributed by one distributor via point-of-sale kiosks in Florida and New Jersey and online. Telecom Argentina USA previously provided copies of the application to state commissions and governors in Alaska, California, Colorado, Connecticut, Florida, Georgia, Illinois, Maine, Maryland, Massachusetts, New Jersey, New York, North Carolina, Oregon, Pennsylvania, South Carolina, Texas, Virginia, Wisconsin, Puerto Rico, and the U.S. Virgin Islands. Because there is a remote possibility customers are located in all states, Telecom Argentina USA has provided copies of the application to discontinue service to commissions and governors in all states.¹ A copy of the supplemental certificate of service is attached.

Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

/s/ Colleen King

Colleen King
Counsel for Telecom Argentina USA, Inc.

¹ See 47 C.F.R. § 63.71(a).

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2014, I caused a true and correct copy of the foregoing to be served by first-class mail on the following:

Alabama Public Service Commission
P.O. Box 304260
Montgomery, AL 36130

The Honorable Robert J. Bentley
600 Dexter Avenue
Montgomery, AL 36130

Arizona Corporation Commission
1300 W. Washington St.
Phoenix, AZ 85007

The Honorable Janice K. Brewer
Arizona Governor
Executive Tower
1700 West Washington Street
Phoenix, AZ 85007

Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

The Honorable Mike Beebe
State Capitol Room 250
Little Rock, AR 72201

Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

The Honorable Jack Markell
150 Martin Luther King Jr. Blvd. South
2nd Floor
Dover, DE 19901

Hawaii Public Utilities Commission
465 South King Street, #103
Honolulu, HI 96813

The Honorable Neil Abercrombie
Governor, State of Hawaii
Executive Chambers, State Capitol
Honolulu, HI 96813

Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

The Honorable C.L. "Butch" Otter
Office of the Governor
State Capitol
P.O. Box 83720
Boise, ID 83720

Indiana Utility Regulatory Commission
PNC Center
101 West Washington Street
Suite 1500 E
Indianapolis, IN 46204

The Honorable Michael R. Pence
200 W. Washington St., Rm. 206,
Indianapolis, IN 46204

Iowa Utilities Board
1375 E. Court Avenue, Room 69
Des Moines, IA 50319-0069

The Honorable Terry Branstad
1007 East Grand Ave.
Des Moines, Iowa 50319

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

The Honorable Sam Brownback
Office of the Governor
Capitol, 300 SW 10th Ave., Ste. 241S
Topeka, KS 66612-1590

Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602-0615

The Honorable Steve Beshear
700 Capitol Avenue, Suite 100
Frankfort, Kentucky 40601

Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street
Post Office Box 91154
Baton Rouge, LA 70821-9154

The Honorable Bobby Jindal
PO Box 94004
Baton Rouge, LA 70804

Michigan Public Service Commission
4300 W. Saginaw Highway
PO Box 30221
Lansing, MI 48909

The Honorable Rick Snyder
P.O. Box 30013
Lansing, MI 48909

Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

The Honorable Mark Dayton
Office of the Governor
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Mississippi Public Service Commission
P.O. Box 1174
Jackson, MS 39215-1174

The Honorable Phil Bryant
P.O. Box 139
Jackson, MS 39205

Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

The Honorable Jay Nixon
P.O. Box 720
Jefferson City, MO 65102

Montana Public Service Commission
1701 Prospect Ave
P.O. Box 202601
Helena, MT 59620-2601

The Honorable Steve Bullock
Office of the Governor
P.O. Box 200801
Helena MT 59620-0801

Nebraska Public Service Commission
1200 N Street, Suite 300
Lincoln, NE 68508

The Honorable Dave Heineman
Office of the Governor
P.O. Box 94848
Lincoln, NE 68509-4848

Nevada Public Utilities Commission
1150 E. William Street
Carson City, NV 89701-3109

The Honorable Brian Sandoval
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

The Honorable Maggie Hassan
Office of the Governor
State House
107 North Main Street
Concord, NH 03301

New Mexico Public Regulation Commission
1120 Paseo De Peralta
PERA Building
P.O. Box 1269
Santa Fe, NM 87504

The Honorable Susana Martinez
490 Old Santa Fe Trail, Rm. 400
Santa Fe, NM 87501

North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

The Honorable Jack Dalrymple
600 East Boulevard Avenue
Bismarck, ND 58505-0001

Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

The Honorable John Kasich
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43215-6117

Oklahoma Corporation Commission
P.O. Box 52000
Oklahoma City, OK 73152-2000

The Honorable Mary Fallin
Oklahoma State Capitol
2300 N. Lincoln Blvd., Room 212
Oklahoma City, OK 73105

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

The Honorable Lincoln D. Chafee
Office of the Governor
82 Smith Street
Providence, RI 02903

South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 E. Capitol Ave.
Pierre, SD 57501-5070

The Honorable Dennis Daugaard
Office of the Governor
500 E Capitol Ave
Pierre, SD 57501

Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

The Honorable Bill Haslam
1st Floor, State Capitol
Nashville, TN 37243

Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84114

The Honorable Gary R. Herbert
Utah State Capitol Complex
350 North State Street, Suite 200
PO Box 142220
Salt Lake City, Utah 84114-2220

Vermont Public Service Department
112 State Street, Third Floor
Montpelier, VT 05620-2601

The Honorable Peter Shumlin
109 State Street, Pavilion
Montpelier, VT 05609

Washington Utilities and Transportation
Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

The Honorable Jay Inslee
Office of the Governor
P.O. Box 40002
Olympia, WA 98504-0002

Public Service Commission of West Virginia
201 Brooks Street
Charleston, WV 25301

The Honorable Earl Ray Tomblin
Office of the Governor
State Capitol
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305

Wyoming Public Service Commission
Hansen Building
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

The Honorable Matt Mead
State Capitol
200 West 24th Street
Cheyenne, WY 82002-0010

/s/ Pam Conley

Pam Conley

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

Section 63.71 and 63.19 Application of)
Telecom Argentina USA, Inc. For Authority)
Pursuant to Section 214 of the Communications)
Act of 1934, to Discontinue the Provision of)
Service)

WC Docket No. _____

**SECTION 63.71 AND SECTION 63.19 APPLICATION OF
TELECOM ARGENTINA USA, INC.**

Telecom Argentina USA, Inc. ("Telecom Argentina USA") hereby submits this application for authority under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Sections 63.71 and 63.19 of the Commission's rules, 47 C.F.R. §§ 63.71 and 63.19, to discontinue the provision of retail telecommunications services. In support of this application, Telecom Argentina USA submits the following:

1. Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1) and (b)(2))

Telecom Argentina USA, Inc.
80 SW 8th Street
Suite 2110
Miami, FL 33130

2. Date of Planned Discontinuance (47 C.F.R. §§ 63.71(a)(2) and (b)(2))

Telecom Argentina USA plans to discontinue its retail telecommunications services as of March 28, 2014, or as soon as possible once the necessary regulatory approvals have been obtained.

3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3) and (b)(2))

Telecom Argentina USA provides a call forwarding service to approximately 600

customers located throughout the United States.

Telecom Argentina USA also provides a pre-paid calling card service. Cards are only distributed by one distributor via point-of-sale kiosks in Florida and New Jersey and online, but can be used to place domestic and international calls throughout the United States.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4) and (b)(2))

Telecom Argentina USA provides two types of telecommunications services: a call forwarding service and a pre-paid calling card service.

Telecom Argentina USA's call forwarding service is an international call forwarding service. Telecom Argentina USA assigns a local number from Argentina, which is automatically forwarded to the number of choice of the customer in the United States. This service allows a customer's relatives from Argentina to reach the customer abroad dialing only a local phone number.

Telecom Argentina USA currently distributes calling cards only in the state of Florida and New Jersey via point-of sale kiosks and online, with one active distributor. These cards can be used anywhere within the United States to place domestic and international calls.

Although at one time Telecom Argentina USA had many customers and higher revenues from its call forwarding and pre-paid calling card services, these businesses have decreased in recent years. Telecom Argentina USA no longer actively markets these services and is not currently investing resources in them. Currently, Telecom Argentina USA provides a call forwarding service to approximately 600 customers. Less than 1,000 pre-paid calling cards are distributed per month.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3))

Telecom Argentina USA has written contracts with each of its call forwarding customers.

The company has provided customers written notification of this discontinuance through correspondence sent February 10, 2014. A copy of this customer notification is included as Exhibit A.

Telecom Argentina USA does not sell its calling cards directly to end users. Rather, it sells the cards through a distributor. Each calling card has a user identification number associated with it. The holder of a calling card accesses Telecom Argentina USA's system by calling an 800 number or a local access number and entering his or her identification number, followed by the number to be called. The cost of the call is deducted from the amount that the holder of the calling card has prepaid. The calling cards are sold in denominations of \$2 and \$5. These cards are all sold by one distributor on the Internet or via point-of-sales kiosks.

Section 63.71(a) of the rules requires that domestic carriers either: (1) notify each affected customer of a proposed discontinuance; or (2) show good cause for providing a different form of notice.¹ The Commission previously has recognized that, in the case of prepaid calling card services, there is good cause for using an alternate method to notify customers.² In such cases, the Commission granted has granted applications to discontinue service without requiring prepaid calling card companies to provide written notice to individual customers.³

Telecom Argentina USA has no direct relationship with the end users of its calling cards, and therefore has no means for providing written notice of a discontinuance of service to each end user. As described above, Telecom Argentina USA distributes its calling cards through only one distributor. The company has requested that the distributor cease its sale of any unsold

¹ 47 C.F.R. § 63.71(a).

² See, e.g., *Comments Invited on Application of PLDT Retail, Inc. to Discontinue Domestic Telecommunications Services*, Public Notice, WC Docket No. 05-73, 20 FCC Red 4208 (2005); *MCI WorldCom Network Services*, Public Notice, NSD File No. W-P-D-436 (Aug. 6, 1999).

³ *Id.*

cards.

Telecom Argentina USA has established a computer generated message that customers will hear when they call the customer service number available on the cards, alerting them as to the last date that the cards may be used. Customers who have unused funds on their cards after the March 28, 2014 discontinuance date may contact customer service, where they will receive directions on how to return unused cards to receive a full refund. The refund will be either provided as a credit on the customer's credit card or by check sent by mail, based on the customer's preference. Moreover, the prepaid calling card business is extremely competitive and customers will continue to have numerous alternative carriers to provide prepaid calling card services.

Copies of this Application are being sent via first class U.S. Mail to the governors and public service commissions of Florida and New Jersey and the Special Assistant for Telecommunications to the Secretary of Defense. Because Telecom Argentina USA also seeks to discontinue the provision of international services through its international Section 214 authorization, IBFS File No. ITC-214-20010129-00034, copies of this Application are also being sent to the Chief of the International Bureau.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Telecom Argentina USA is non-dominant with respect to the services that it proposes to discontinue.

Conclusion

For the foregoing reasons, Telecom Argentina USA requests that the Commission, as expeditiously as possible, issue a public notice announcing the filing of Telecom Argentina USA's application to discontinue service, and that, in accordance with its discontinuance procedures, the Commission provide for the application to be granted automatically on the thirty-

first day after the public notice has been released.

Respectfully submitted,

TELECOM ARGENTINA USA, INC.

/s/ Maximo Lema

Maximo Lema
President
Telecom Argentina USA, Inc.
80 SW 8th Street
Suite 2110
Miami, FL 33130

Colleen King
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
Tel: 202-719-7307
cking@wileyrein.com

Dated: February 11, 2014

EXHIBIT A

Dear Customer,

This letter will serve as formal notice that Telecom Argentina USA, Inc. will discontinue its Call Forwarding Services provided under the commercial names Me Llamas, Me Llamas Premium, Find Me, and Te Llamo on March 28, 2014.

Telecom Argentina USA, Inc. is providing you with notice of our discontinuance of service in order to ensure that you will have ample time to make other arrangements for replacement service. Please note that this service will not be transferred automatically to another carrier. In order for you to maintain uninterrupted service, you must make arrangements with an alternative service provider well in advance of the termination date. You should begin that process immediately.

We provide below a list of alternative service providers that may be available to replace our service. Telecom Argentina USA, Inc. does not endorse or recommend any particular service provider. Telecom Argentina USA, Inc. provides this information only to assist you, but does not control or guarantee and is not responsible for the accuracy, relevance, timeliness, or completeness of information or services provided by these providers. We strongly recommend that you review each offer carefully:

Orbitel USA / Tel: 1 (800) 875 0686

Telehispanic Services / Tel: 1 (866) 897-8520

Llamada Directa / Tel: 1 (866) 505 2985

The Federal Communications Commission ("FCC") will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Telecom Argentina USA, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

If you have any questions, please contact Telecom Argentina USA, Inc.:

Telecom Argentina USA, Inc.

80 SW 8th Street

Suite 2110

Miami, FL 33130

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2014, I caused a true and correct copy of the foregoing to be served by first-class mail on the following:

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Rick Scott
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

The Honorable Chris Christie
Office of the Governor
PO Box 001
Trenton, NJ 08625

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

/s/ Pam Conley

Pam Conley

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2014, I caused a true and correct copy of the foregoing to be served by first-class mail on the following:

Regulatory Commission of Alaska
701 West Eighth Avenue, Suite 300
Anchorage, AK 99501-3469

The Honorable Sean Parnell
P.O. Box 110001
Juneau, AK 99811-0001

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

The Honorable Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Colorado Department of Regulatory Agencies
1560 Broadway, Suite 110
Denver, CO 80202

The Honorable John W. Hickenlooper
136 State Capitol
Denver, CO 80203-1792

Connecticut Public Utilities Regulatory
Authority
Ten Franklin Square
New Britain, CT 06051

The Honorable Dannel P. Malloy
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Georgia Public Service Commission
244 Washington Street, SW
Atlanta GA, 30334-9052

The Honorable Nathan Deal
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334

Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

The Honorable Pat Quinn
Office of the Governor
207 State House
Springfield, IL 62706

Maine Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

The Honorable Paul LePage
Office of the Governor
#1 State House Station
Augusta, ME 04333-0001

Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul St., 16th Floor
Baltimore, MD 21202

The Honorable Martin O'Malley
100 State Circle
Annapolis, MD 21401

Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
Suite 820
Boston, MA 02118-6500

The Honorable Deval Patrick
Massachusetts State House
Office of the Governor
Room 105
Boston, MA 02133

New York State Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

The Honorable Pat McCrory
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Public Utility Commission of Oregon
P.O. Box 1088
Salem OR 97308-1088

The Honorable John Kitzhaber
160 State Capitol
900 Court Street
Salem, Oregon 97301-4047

Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

The Honorable Tom Corbett
Office of the Governor
225 Main Capitol Building
Harrisburg, PA 17120

Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

The Honorable Nikki Haley
Office of the Governor
1205 Pendleton Street
Columbia, SC 29201

Public Utility Commission of Texas
1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711-3326

The Honorable Rick Perry
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

Virginia State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, Virginia 23218

The Honorable Terry McAuliffe
1111 East Broad Street
Richmond, VA 23219

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

The Honorable Scott Walker
115 East Capitol
Madison, WI 53702

Puerto Rico Telecommunications
Regulatory Board
500 Ave. Roberto H. Todd
(Pda. 1.8-Santurce)
San Juan, PR 00907-3981

The Honorable Alejandro Javier García
Padilla
Calle La Fortaleza
San Juan, PR 00901

Virgin Islands Public Service Commission
Barbel Plaza
No.8 Estate Ross, Charlotte Amalie
P.O. BOX 40
St. Thomas, USVI 00804

The Honorable John de Jongh, Jr.
St. Thomas & Water Island
21-22 Kongens Gade
Charlotte Amalie
St. Thomas, USVI 00802

/s/ Pam Conley

Pam Conley