BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of dPi Teleconnect, LLC) File No. CN-2013-0121 Changing Name to Unity Telecom, LLC) Tariff No. YC-2013-0165

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation states:

- 1. On October 1, 2012, the Commission received a notification and an illustrative tariff sheet, which reflect the name change of dPi Teleconnect, LLC to Unity Telecom, LLC ("the Company").
- 2. Rule 4 CSR 240-2.060 establishes filing requirements for certificated company name changes; as noted in the attached Staff Memorandum, the Company has complied with the rule, including the customer notice provisions. No entities intervened to oppose the name change. The filed revised tariff sheets are compliant with Commission rules.
- 3. Unfortunately, as the Commission can see from the attached Memorandum, the Staff has experienced numerous difficulties with the Company's compliance with the Commission's rules and procedures. For example, the Company has seriously lagged in its compliance with keeping its EFIS contacts updated. The Company is routinely late in making USF filings.
- 4. Although the tariffs will go into effect by operation of law over the weekend, the Commission will still need to issue an Order Recognizing Name Change to keep its records in order. The recommendations the Staff makes below can be incorporated at that time.

WHEREFORE, the Staff recommends that the Commission issue an Order Recognizing the Name Change, but use the opportunity to remind the Company that its certification as a competitive local exchange telecommunications company is conditioned on compliance with the Commission's rules, including responses to Staff requests, annual report filings, timely USF filings and keeping its EFIS contacts current. The Staff requests that the Commission specifically list all these conditions, as well as any others the Commission deems appropriate, in the Ordered section of its Order Recognizing Name Change, recognize the name under which the Company does business as Unity Telecom, LLC, and approve the revised tariff sheets under the above-noted tracking numbers or allow them to take effect by operation of law on October 14, 2012.

Respectfully submitted,

Colleen M. Dale Senior Counsel

Missouri Bar No. 31624

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-4255 (Telephone)

cully.dale@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 12th day of October, 2012.