



5 ROCKINGHAM STREET • PO BOX 495 • BELLOWS FALLS, VT 05101 • (802) 463-2111 voice • 463-1712 fax

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MAR 25 2005
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March 24, 2005

DOCKET FILE COPY ORIGINAL

Via UPS Overnight Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: Docket No. CC-00-257
Transfer of the Vermont subscriber base of RCC Atlantic Long Distance, Inc. to
National Mobile Communications Corporation

No. of Copies rec'd 075
List ABCDE

Dear Ms. Dortch:

National Mobile Communications Corporation d/b/a SoVerNet Communications (NMC) submits this letter as part of the streamlined process for compliance for carrier-to-carrier sale or transfer of subscriber bases. NMC is acquiring substantially all of the Vermont assets of RCC Atlantic Long Distance, Inc. (RCC-LD). As a result of the transaction, NMC will be the entity providing intraLATA and interstate long-distance, wireline-telecommunications service to the former Vermont RCC-LD customers that elect to subscribe to NMC.

The parties to the transaction are National Mobile Communications Corporation, d/b/a SoVerNet Communications (NMC) and RCC Atlantic Long Distance, Inc. (RCC-LD). NMC is a Massachusetts corporation that provides facilities-based and resold telecommunications services in Vermont, including service to the local exchange. RCC-LD is a Minnesota corporation transacting business in Vermont that resells services of one or more unaffiliated telecommunications carriers to allow RCC-LD's customers to make calls to domestic or international points. RCC-LD relies on "blanket" Section 214 authorization granted by the Commission for domestic resale operations,¹ and RCC-LD was granted

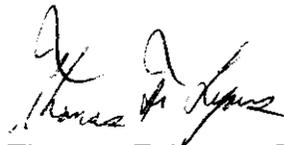
¹ As described on the website of the Wireline Competition Bureau, in 1999, as to domestic resale services, the Commission eliminated all entry certification filing requirements under Section 214 of the

Section 214 authorization in File No. ITC-214-19980710-00472 (Prior File No. ITC-98-264) for international resale service.

The migration of the affected subscribers to the acquiring carrier, NMC, is expected to occur on and after April 27, 2005. NMC has fully complied with the rules and regulations of the Federal Communications Commission ("FCC"), 47 C.F.R. 64.1120(c), requiring advance notice to customers and permitting the transfer of those customers to NMC without first obtaining each customer's authorization and verification, and with other statutory and Commission requirements that apply to the Commission's streamlined process. See 47 C.F.R. § 64.1120(e). Copies of the three notification letters (two business and one residential) sent to affected RCC-LD customers are included herein as Attachments 1a, 1b and 1c. A Certification of Compliance is included herein as Attachment 2.

Should you have any questions or concerns, please communicate with this office. My direct telephone line is (802) 460-9233.

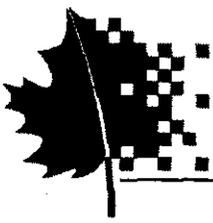
Sincerely,



Thomas F. Lyons, President

Enclosures: Subscriber notification letters: Attachments 1a, 1b and 1c
Certification of Compliance: Attachment 2

c: Elizabeth Kohler, Esq. (via email and USPS)
Suzanne M. Monte, Esq. (via email and USPS)
Dixie Henry, Esq. (via USPS)
Lawrence Lackey (via USPS)



ATTACHMENT 1a

SOVERNET[®]

VERMONT'S SOVEREIGN CONNECTION

5 ROCKINGHAM STREET ■ PO BOX 495 ■ BELLOWS FALLS, VT 05101
(802) 463-2111 voice ■ 463-2110 fax ■ www.sover.net

March 25, 2005

To: RCC/Unicel Business Long Distance Customers
From: Tom Lyons, President
Re: SoVerNet's Rates, Terms and Conditions of Service

As you know, SoVerNet is in the process of purchasing the RCC/Unicel Long Distance customer base in Vermont, subject to the approval of the Vermont Public Service Board. We want to welcome you to our Company and take this opportunity to provide you with some details about the transition, our Long Distance service as well as the terms and conditions associated with our services.

We will become your Long Distance provider on April 27, 2005. Your business rates are as follows:

- \$.069/minute Interstate & Intrastate long distance, 24/7
- \$.069/minute for toll-free calls, 24/7
- \$1.50/month for each toll-free number
- \$3.95 monthly fee

SoVerNet understands that these rates are the same as, or lower than your present rates with Unicel. By purchasing additional SoVerNet services under a term contract you may achieve lower rates.

SoVerNet Phonecard rates are listed below. Please visit <http://www.sover.net/services/rezvoice.shtml#phonecards> for more information about our Phonecards.

- \$0.18/minute
- 120 Free minutes upon activation
- Payphone Surcharge: \$0.35/minute

Please refer to our website for our International rates and other discount International rate plan information at <http://www.sover.net/services/rezvoice.shtml#intl>.

SoVerNet will be responsible for any carrier change charges associated with this transfer. In addition, you will be seamlessly transitioned to our service unless you exercise your right to choose a different carrier prior to April 27, 2005.

All current RCC/Unicel Long Distance customers receiving this letter, including those who have arranged preferred carrier (PIC) freezes through their local service providers on their Long Distance service will be transferred to SoVerNet, unless a different carrier has been selected prior to April 27, 2005. Even if you have a PIC freeze, this transfer will occur automatically, unless you select another carrier and then arrange a new PIC freeze.

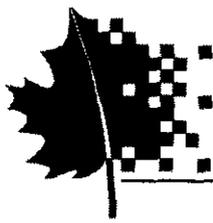
Our terms and conditions for state-to-state Long Distance can be found online at <http://www.sover.net/tariff/interlata-terms.shtml>. In the event of an increase or decrease to our rates, SoVerNet will notify the Customer of in accordance with the procedure established by the Vermont Public Service Board. As a courtesy, and for the convenience of our customers, SoVerNet will post the changes on our Internet website at the above address thirty (30) days in advance of their effective date. Payment of charges or continued use of Service after effective date of such posted changes will constitute agreement by Customer to the change. For a complete Vermont Public Service Board filing of our Regulations and Schedule of Local and Intrastate Charges please go to our tariff filing at <http://www.sover.net/tariff/tariff.shtml> on the web.

We look forward to providing you with exceptional Long Distance service. Please direct any complaints prior to April 27, 2005 to Unicel by calling 800-215-7004. After April 27, please do not hesitate to contact SoVerNet with any questions or complaints, toll-free 877-877-2120. Visit our Unicel information webpage at <http://www.sover.net/unicel/> for more details.

Individuals with disabilities may call 1-866 DSL-HERE, ext. 103 during business hours to achieve auditory access, or link to <http://www.sover.net/unicel> for visual access for low vision users.

Sincerely,

Tom Lyons, President



ATTACHMENT 1b

SOVERN. NET

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March 25, 2005

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From: Tom Lyons, President
Re: SoVerNet's Rates, Terms and Conditions of Service

As you know, SoVerNet is in the process of purchasing the RCC/Unicel Long Distance customer base in Vermont, subject to the approval of the Vermont Public Service Board. We want to welcome you to our Company and take this opportunity to provide you with some details about the transition, our Long Distance service as well as the terms and conditions associated with our services.

We will become your Long Distance provider on April 27, 2005. Your business rates are as follows:

- \$.059/minute Interstate & Intrastate long distance, 24/7
- \$.059/minute toll-free calls, 24/7
- \$1.50/month for each toll-free number
- No monthly fee

SoVerNet understands that these rates are the same as, or lower than your present rates with Unicel. We invite you to call us toll-free at 877 877-2120 to discuss achieving lower rates by meeting certain volume thresholds or purchasing additional SoVerNet services under a term contract.

SoVerNet Phonecard rates are listed below. Please visit <http://www.sover.net/services/bizvoice.shtml#phonecards> for more information about our Phonecards.

- \$0.124/minute
- 120 Free minutes upon activation
- Payphone Surcharge: \$0.35/minute

Please refer to our website for our international rates and other discount international rate plan information at <http://www.sover.net/services/bizvoice.shtml#intl>.

SoVerNet will be responsible for any carrier change charges associated with this transfer. In addition, you will be seamlessly transitioned to our service unless you exercise your right to choose a different carrier prior to April 27, 2005.

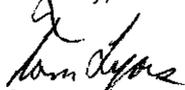
All current RCC/Unicel Long Distance customers receiving this letter, including those who have arranged preferred carrier (PIC) freezes through their local service providers on their Long Distance service will be transferred to SoVerNet, unless a different carrier has been selected prior to April 27, 2005. Even if you have a PIC freeze, this transfer will occur automatically, unless you select another carrier and then arrange a new PIC freeze.

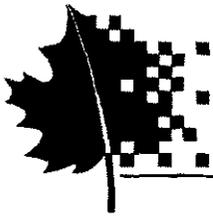
Our terms and conditions for state-to-state Long Distance can be found online at <http://www.sover.net/tariff/interlata-terms.shtml>. In the event of an increase or decrease to our rates, SoVerNet will notify the Customer of in accordance with the procedure established by the Vermont Public Service Board. As a courtesy, and for the convenience of our customers, SoVerNet will post the changes on our internet website at the above address thirty (30) days in advance of their effective date. Payment of charges or continued use of Service after effective date of such posted changes will constitute agreement by Customer to the change. For a complete Vermont Public Service Board filing of our Regulations and Schedule of Local and Intrastate Charges please go to our tariff filing at <http://www.sover.net/tariff/tariff.shtml> on the web.

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Sincerely,


Tom Lyons, President



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March 25, 2005

To: RCC/Unicel Residential Long Distance Customers
 From: Tom Lyons, President
 Re: SoVerNet's Rates, Terms and Conditions of Service

As you know, SoVerNet is in the process of purchasing the RCC/Unicel Long Distance customer base in Vermont, subject to the approval of the Vermont Public Service Board. We want to welcome you to our Company and take this opportunity to provide you with some details about the transition, our Long Distance service as well as the terms and conditions associated with our services.

We will become your Long Distance provider on April 27, 2005. Your residential rates are as follows:

- \$.069/minute Interstate & Intrastate long distance, 24/7
- \$.069/minute for toll-free calls, 24/7
- \$1.50/month for each toll-free number
- \$3.95 monthly fee

SoVerNet understands that these rates are the same as, or lower than your present rates with Unicel. By purchasing additional SoVerNet services under a term contract you may achieve lower rates.

SoVerNet Phonocard rates are listed below. Please visit <http://www.sover.net/services/rezvoice.shtml#phonecards> for more information about our Phonecards.

- \$.018/minute
- 120 Free minutes upon activation
- Payphone Surcharge: \$0.35/minute

Please refer to our website for our International rates and other discount International rate plan information at <http://www.sover.net/services/rezvoice.shtml#intl>.

SoVerNet will be responsible for any carrier change charges associated with this transfer. In addition, you will be seamlessly transitioned to our service unless you exercise your right to choose a different carrier prior to April 27, 2005.

All current RCC/Unicel Long Distance customers receiving this letter, including those who have arranged preferred carrier (PIC) freezes through their local service providers on their Long Distance service will be transferred to SoVerNet, unless a different carrier has been selected prior to April 27, 2005. Even if you have a PIC freeze, this transfer will occur automatically, unless you select another carrier and then arrange a new PIC freeze.

Our terms and conditions for state-to-state Long Distance can be found online at <http://www.sover.net/tariff/interlata-terms.shtml>. In the event of an increase or decrease to our rates, SoVerNet will notify the Customer of in accordance with the procedure established by the Vermont Public Service Board. As a courtesy, and for the convenience of our customers, SoVerNet will post the changes on our internet website at the above address thirty (30) days in advance of their effective date. Payment of charges or continued use of Service after effective date of such posted changes will constitute agreement by Customer to the change. For a complete Vermont Public Service Board filing of our Regulations and Schedule of Local and Intrastate Charges please go to our tariff filing at <http://www.sover.net/tariff/tariff.shtml> on the web.

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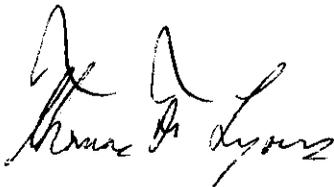
Sincerely,

Tom Lyons, President

ATTACHMENT 2

CERTIFICATION OF COMPLIANCE

National Mobile Communications Corporation (NMC) certifies compliance with the requirements of 47 C.F.R. § 64.1120(c), with regard to the transfer of RCC Atlantic Long Distance, Inc.'s Vermont intraLATA and interstate long-distance, wireline-telecommunications customers to NMC. This includes the requirement to provide advanced subscriber notice, in accordance with 47 C.F.R. §64.1120(e)(3), and the obligations specified in that notice.

A handwritten signature in black ink, appearing to read "Thomas F. Lyons". The signature is written in a cursive style with a large initial "T" and "L".

Thomas F. Lyons, President