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OF COUNSEL
VINCENT T. EARLY
THOMPSON BENNETT
JOHN T. PETERS, JR.
JOSEPH J. BURGIE
(1920 - 1992)

October 29, 2001

Via Federal Express

Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20024

Dear Sir/Madam:

Enclosed for filing is our original Petition for Review filed on behalf of Alliance Group Services, Inc. I have enclosed an additional four copies of the Petition, together with Exhibits and a Certificate of Service. Please contact the undersigned with any questions.

Yours truly,

EARLY, LENNON,
CROCKER & BARTOSIEWICZ, P.L.C.


Lawrence M. Brenton

ljb
Enclosures

No. of Copies rec'd 0+4
LIST A B C D E

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

RECEIVED
OCT 30 2001
FCC MAIL ROOM

In the Matter of)
)
) Docket Nos. 96-45 and 97-21
Request for Review by)
Alliance Group Services, Inc., of Decision)
of Universal Service Administrator)

To: The Commission

PETITION FOR REVIEW

ALLIANCE GROUP SERVICES, INC.

David G. Crocker
Lawrence M. Brenton

EARLY, LENNON, CROCKER &
BARTOSIEWICZ, P.L.C.
900 Comerica Building
Kalamazoo, MI 49007
(616) 381-8844

Its Counsel

October 29, 2001

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SUMMARY

Alliance Group Services, Inc. ("Alliance Group") seeks review of a Decision of the Universal Service Administrator issued October 1, 2001. The Administrator has taken the following actions to which Alliance Group objects and petitions for review:

A. Refused to accept Alliance Group's year 2000 FCC form 499-A, thereby refusing to assess universal support mechanism charges to Alliance Group based on Alliance Group's actual 1999 end user revenues as required by law;

B. Accepted for filing U. S. Republic Communications, Inc. 's year 2000 FCC form 499 filings, whether filed timely or not, reporting U. S. Republic's 1999 end user revenue and, at U.S. Republic's request;

C. Transferred and reallocated to Alliance Group all universal support mechanism charges arising from U.S. Republic's 1999 end user revenues.

Alliance Group maintains that the above actions were mistaken, unlawful, arbitrary, unreasonable, done in violation of Alliance Group's rights to due process and were entirely outside the authority delegated to the Administrator's staff or Board.

Through oversight, Alliance Group did not file its own year 2000 FCC form 499-A, reporting its 1999 end user revenues by April 1, 2000. It attempted to make such a filing in April 2001. This filing was rejected by the Administrator for the stated reason that it had been submitted more than one year after the date of the original filing. As there had not been an original filing, Alliance Group submitted a Letter of Appeal and a 499-A form identified as an original filing. This 499-A has now been rejected on the basis that the Administrator can refuse to accept a revised filing more than one year after the original filing or more than one year after the date when the original filing was due.

The Administrator does not have the authority to choose to reject an original 499-A filing. It can cause an audit or investigate the filing if it does not believe or agree with the numbers reported but it does not have the unbridled authority to reject filings as it has done in this case, to choose to accept a 499-A filing submitted by a different carrier, and decide to allocate all the resulting universal service support mechanism charges to Alliance Group. The Administrator assessed charges based on its interpretation of the terms of an asset purchase agreement between U. S. Republic and Alliance Group. The Administrator does not have the authority to interpret and construe purchase agreements, without factual investigation, at the staff level, in secrecy, and without notice or an opportunity to be heard.

The rejected 499-A filing by Alliance Group reported Alliance Group's revenues for 1999 in the amount of \$427,463.00. The resulting universal service support mechanism charges are owed in any case. However, the Administrator prefers to accept the 499-A form filed by U. S. Republic disclosing U. S. Republic's 1999 revenues of more than \$13,000,000.00 which, taken together with the Administrator's construction of the contract between the parties, results in charges of \$763,717.56 to Alliance Group. The reallocation of charges from U. S. Republic to Alliance Group occurred in secrecy, sometime in June or July of the year 2000, through means unknown to Alliance Group. After some type of communication with sources other than Alliance Group and review of the purchase agreement, the Administrator issued a series of new and confusing charges and credits to Alliance Group which initially, in September of 2000, made it appear that Alliance Group owed virtually nothing. Through additional accelerated charges over the last three months of the year 2000 and later revocation of credits, the amount charged to Alliance Group over the last four months of the year 2000 became \$763,717.56. Alliance Group protests these actions, asks that its year 2000 499-A be accepted for filing and that the charges wrongly allocated to it by the Administrator and related late charges be reversed.

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

In the Matter of)
)
) Docket Nos. 96-45 and 97-21
Request for Review by)
Alliance Group Services, Inc., of Decision)
of Universal Service Administrator)

To: The Commission

PETITION FOR REVIEW

Alliance Group Services, Inc. ("Alliance Group"), by its counsel, hereby requests that the Commission review *de novo* the attached Decision (Exhibit D) of the Universal Service Administrative Company ("USAC") pursuant to 47 C.F.R. § 54.719 and 47 C.F.R. §54.723.

I.

INTRODUCTION

Alliance Group seeks review of the Decision of the Administrator, USAC, which a) rejects and refuses to accept for filing Alliance Group's year 2000 FCC Form 499-A; b) adopts, by means of construction and interpretation of a Purchase and Sale Agreement U. S. Republic's ex-parte request or instruction to charge all universal service support mechanism charges based on U. S. Republic's 1999 revenues to Alliance Group; and c) imposes a completely unexplained and erroneous series of universal service support mechanism charges upon Alliance Group by means of late, confusing and conflicting invoices, temporary credits and other as yet unaccounted for and unexplainable adjustments and account transactions.

II.

SUMMARY OF FACTS AND ARGUMENT

Alliance Group Services, Inc. ("Alliance Group") is a telecommunications carrier providing interexchange services in numerous states. Because it conducted operations in 1999 generating interstate end user telecommunications revenues, it should have filed a year 2000 FCC Form 499-A in April of 2000. Due to clerical error, Alliance Group filed its first 499 Form (FCC Form 499-S) in September of 2000. It attempted to file its 2000 FCC Form 499-A on April 13, 2001. This Form was identified at line 609 as a "Revised filing". A copy of this Form 499-A is attached as Exhibit A.

By letter dated June 7, 2001, the Universal Service Administrative Company (the "Administrator") rejected the Form 499-A, stating in relevant part that "We are unable to accept the revision because it was not filed within one year of the original submission". The June 7, 2001 letter from the Administrator is attached as Exhibit B.

On July 2, 2001, Alliance Group submitted its Letter of Appeal to the Administrator. A copy of the letter of appeal with attachments is attached as Exhibit C. In its Letter of Appeal, Alliance Group submitted that its 2000 Form 499-A report should be accepted for filing notwithstanding the fact that it was late filed. As Alliance Group had not initially filed a 2000 Form 499-A, the Letter of Appeal also included an additional, original 2000 Form 499-A identified "Original filing" and containing the same information as the previously rejected filing.

The Letter of Appeal also spoke to the fact that the Administrator was, evidently, using its arbitrary rejection of Alliance Group's 2000 Form 499-A as the pretext for mistakenly and unjustifiably invoicing Alliance Group for grossly overstated universal service support mechanism charges. As discussed below, these charges were calculated and reallocated to Alliance Group by a process never explained by the Administrator. They obviously derive from reported 1999 revenues

associated with U. S. Republic Communications, Inc. ("U. S. Republic"), a Texas Corporation wholly owned by Vartec Telecom Holding Company, a Delaware Corporation.

In response to the Letter of Appeal, the Administrator on October 1, 2001 issued its "Administrator's Decision on Contributor Appeal", attached as Exhibit D. On the question of its willingness to accept for filing any Alliance Group 2000 FCC Form 499-A, the Administrator now invoked the apparently unwritten rule that a filing will not be accepted if submitted more than one year after the date of the initial filing or the date when the initial filing was due. This decision, apparently unsupported by any authority beyond the Administrator's own arbitrary preferences, would forever preclude Alliance Group or other contributors from filing a 499-A report of 1999 interstate end user telecommunications revenues after April 1, 2000, whether an initial filing was made or not. (Such a rule, if it existed, would prevent a contributor from ever filing a revision reporting increased 1999 end user revenues or newly reporting revenues. It seems extremely doubtful that the Administrator would, in fact, be compelled by rule to refuse to accept any such late filing. If there were in fact such a rule, no contributor would even be able to supplement its previous filing with increased numbers and pay the resulting additional contributions).

The Administrator has exceeded its authority by arbitrarily rejecting Alliance Group's year 2000 499-A, by electing to adopt U. S. Republic's 2000 499-A and by adopting or applying unadopted rules to interpret and construe a purchase and sale Agreement between private parties. The Administrator is not authorized to engage in rule making or interpretation of the type done here. 47 C.F.R. §54.702(C).

In the Decision (Exhibit D), the Administrator states that, in fact, Universal Service Support Mechanism charges to Alliance Group in year 2000 were "based on U. S. Republic's FCC Form 499-A submitted in September 2000". The Administrator has declined to provide Alliance Group with

a copy of U. S. Republic's September 2000 Form 499-A or other information. Obviously if filed in September of 2000, the 499 report the Administrator chose to accept was filed well past the due date. Nevertheless, the Administrator has mistakenly chosen to adopt U. S. Republic's report and transfer all resulting charges to Alliance Group.

Alliance Group acquired some but not all assets of U. S. Republic under a Purchase and Sale Agreement dated December 23, 1999 (Exhibit E). As Alliance Group pointed out in its Letter of Appeal dated July 2, 2001, U. S. Republic continued in existence until at least March 22, 2001. (Exhibit F). On information and belief, U. S. Republic continued in operation after completion of its transaction with Alliance Group at least throughout calendar year 2000 and continued to serve a portion of the customer base that had generated 1999 revenues. The Administrator billed U. S. Republic on a monthly basis for Universal Service Support Mechanism charges until June of 2000 and was paid in whole or in part. (Exhibit H). As shown by the June invoice to U. S. Republic, these charges from the Administrator were paid by U. S. Republic until June. The Administrator has declined to furnish any of this information to Alliance Group, taking the position that all the account information of U. S. Republic is confidential.

In August of 2000, U. S. Republic sent Alliance Group invoices and a demand that it be reimbursed for some payment. (Exhibit G). Through means unknown to Alliance Group, U. S. Republic apparently also persuaded staff at the Administrator to issue credits for all year 2000 invoices to the U. S. Republic account and to charge Alliance Group, over the last four months of calendar year 2000, over \$763,717.56 in universal service support mechanism charges, late charges and other charges. (Exhibit H).

This reallocation of charges from U. S. Republic to Alliance Group occurred virtually without the participation of Alliance Group and, it appears, by means of ex-parte communications by U. S.

Republic to the Administrator. Lori Terraciano of USAC has stated to counsel for the Alliance Group that she reviewed the Purchase and Sale Agreement of December 23, 1999, that it was her interpretation of the Purchase and Sale Agreement that invoices issued in calendar year 2000 were to be paid by Alliance Group and that if the terms of the Purchase and Sale Agreement had been drafted differently, she might have reached the opposite conclusion. (Exhibit J). When asked by what authority staff was reviewing the Purchase and Sale Agreement and making such determinations in virtual secrecy, staff furnished Alliance Group's counsel with a copy of a staff proposal which it represented had been circulated and approved at a meeting of the Board of Directors of the Administrator in January 2000. A copy of this staff paper and the minutes of the relevant Board meeting are attached as Exhibit I. Whether the staff proposal was, in fact, identical to one circulated at the Administrator's Board meeting is doubtful and whether the Board has the authority to adopt such general rules is extremely doubtful. As described in the Declaration of Alliance Group's counsel filed herewith (Exhibit J), the actual minutes of the Board meeting do not specifically incorporate staff's recommended guidelines.

This decision was implemented by the Administrator issuing an extremely confusing series of credits and charges starting in July of 2000. It appeared from the combination of credits and charges in September that Alliance Group's liability was virtually zero but by loading in accelerated charges over the last four months of the year 2000 and by taking away credits, the net result was the imposition of \$763,717.56 in charges to Alliance Group, together with substantial late payment penalties.

The Board does not have authority to adopt such rules and policies. It does not appear that the Board itself actually participated in any part of this process and instead, staff has undertaken to take all of the described actions. Certainly, staff does not have authority to secretly construe agreements

and adjust accounts. If either staff or the Board had authority to take these actions, neither would be entitled to do so in secrecy.

The Purchase and Sale Agreement of December 23, 1999 in fact does not provide that invoices during calendar year 2000 based on U. S. Republic's 1999 revenues were to be paid by Alliance Group. (In its letter, Exhibit G, U. S. Republic's parent asserted to Alliance Group that the December 1999 invoice and all subsequent invoices which it had been receiving for a number of months were payable by Alliance Group). In fact, the December, 1999 invoice to U. S. Republic was based on U. S. Republic's year 1999 499-A filed the previous April. USAC invoices during the first half of calendar year 2000 were based on U. S. Republic's 499-S presumably filed in September of 1999 and reporting U. S. Republic revenues for the first six months of 1999. USAC invoices to U. S. Republic for all of calendar year 2000 would have been based on U. S. Republic's year 2000 499-A, reporting revenues for calendar year 1999.

Alliance Group did not, in fact, generate or receive any interstate or international end user telecommunications revenues in respect of any part of the U. S. Republic customer base in 1999. U. S. Republic should have (and probably did) file its 499-A in April of 2000, completing its report of its end user revenues in 1999, which then generated USAC invoice billings during calendar year 2000 to U. S. Republic.

If, as claimed by U. S. Republic in Exhibit G, Alliance Group was to pay USAC invoices received by U. S. Republic in December 1999 and thereafter, the Purchase and Sale Agreement could have plainly said so. Had Alliance Group generated end user revenues in 1999 in respect of U. S. Republic customers, which it did not, Alliance Group might have been obligated to pay a fraction of U. S. Republic's USAC invoices in calendar year 2000. Alliance Group did not generate any end user revenues from the former U. S. Republic customer base until calendar year 2000 which it duly

reported on its 499-S in September of 2000 and which, under the practice at that time, resulted in USAC invoices in the first half of calendar year 2001. (The procedure has now changed so that the September 2000 499-S resulted in USAC invoices during the first quarter of 2001. The 2001 499-A resulted in invoices during the second quarter of 2001 and subsequent quarterly 499 reports result in monthly USAC invoices for quarterly periods).

III.

CONCLUSION

On de novo review, Petitioner requests that the Commission direct the Administrator to accept Alliance Group's year 2000 499-A for filing. Petitioner requests that the Administrator be directed to reverse and credit the charges including late charges and penalties assessed against Alliance Group based on U. S. Republic's 2000 499-A filing or other filings and the Administrator's interpretation of the purchase and sale agreement between U. S. Republic and Alliance Group.

Respectfully submitted,

ALLIANCE GROUP SERVICES, INC.

By: 

David G. Crocker
Lawrence M. Brenton

EARLY, LENNON,
CROCKER & BARTOSIEWICZ, P.L.C.
900 Comerica Building
Kalamazoo, Michigan 49007
(616) 381-8844

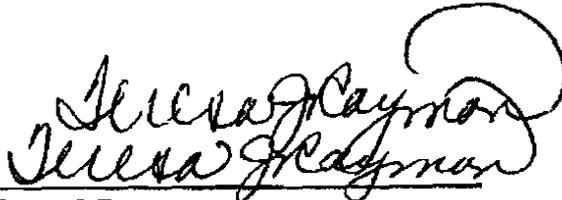
Its Counsel

October 29, 2001

CERTIFICATE OF SERVICE

I, Teresa J. Rayman, hereby certify that the foregoing "Petition for Review" was served this 29th day of October, 2001, by depositing a true copy thereof with the United States Postal Service, first class postage prepaid, addressed to:

D. Scott Barash, Esq.
Vice President & General Counsel
Universal Service Administrative Company
Suite 600
2120 L Street, NW
Washington, D.C. 20037



Teresa J. Rayman

Teresa J. Rayman

ATTACHMENT C

To: Paul Pimental
Fax #: (818) 977-7250 and (518) 956-5104
Re: USRC FCC 499-A
Date: September 19, 2000
Pages: 7, including this cover sheet

FACSIMILE

Comments:

Please find the attached report pursuant to our telephone conversation. Please note that I have forwarded your request for the additional information to the appropriate individual and you should have been/be contacted regarding such. Please contact me at the below-listed contact information if you have any questions or need additional information.

Thank you.

From the desk of...

Maggie
Maggie E. Horne
Regulatory Project Manager
VerTec Telecom, Inc.
1800 Victory Drive
Dallas, Texas 75236

214-424-1512
Fax: 214-424-1510

2000 FCC Form 498A Telecommunications Reporting Worksheet

See Form 498B for instructions before completing.

Approved by CSR
200-4885

Section 1 - Provider Identification Information

491 Form 498-B If you don't know your number, contact the information on (900) 980-4900

If you use a new file, leave blank and a Form 498-B will be mailed to you.

011765

102 Legal name of reporting entity

U.S. Republic Communications, Inc.

103 NIS number (if applicable)

75-2654939

104 Name telecommunication services provider if being notified as

U.S. Republic Communications, Inc.

105 Provide communication services (check box or check/describe service being reported only - see directions. Check one box only)

- CARRIER
- COLLECTOR/STATION (includes long-distance and payphone)
- LOCAL PROVIDER
- PHYSICAL CARRIER
- SPECIAL TARIFF SERVICE PROVIDER
- OTHER LOCAL (Other than local or other toll is checked)
- OTHER TOLL (Other than local or other toll is checked)

106 Holding company (if different company than reporting entity)

Partec Telecom Holding Company

107 FCC Registration Number (FRN) (not required for April 2000 filing)

108 Management company (if carrier is managed by another entity)

109 Complete the following address of reporting entity

3200 West Pleasant Run Road
Lancaster, Texas 75146

Effective 4/18/00:
1600 Glyzeroy
Dallas, Texas 75115

110 Complete business address for customer inquiries and receipt of additional form when not entered on Line 109

117 Telephone number for customer inquiries and receivables

(800) 1-480-9940

118 All trade names that you use in providing telecommunication services. This should include all names by which you are identified on customer bills.

a	U.S. Republic Communications, Inc.	1
b		1
c		1
d		1
e		1
f		1

One or additional sheets if necessary. Each reporting entity must provide all answers used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THIS WORKSHEET CAN BE FINED BY FIVE OR TEN THOUSAND DOLLAR TIME UP TO THE UNITED STATES CODE 18 U.S.C. 1001

Not record

2000 FCC Form 678A Telecommunications Reporting Worksheet

Page 1

201	Form 480 ID Number: 815	\$11765	
202	Legal Name of Reporting Entity: (Non-Lien) 201	U.S. Republic Communications, Inc.	
203	Parent who owns/controls/controls	Marcie Borne, Senior Regulatory Analyst	
204	Telephone Number of this person	(972) 216-7745	
205	Fax Number of this person	(972) 230-7666	
206	E-mail of this person	mlborner@rcr.net	
207	Corporate office, city, state, and mailing address to which future Registrations Reporting Worksheet should be sent	Effective 4/10/00: 1600 Ezeroy Dallas, Texas 75235 Attn: Marcie Borne	
208	Other address and listing contact person. (This information will send later for consideration by the address. Please check a written request for alternative listing arrangements.)	Effective 4/10/00: 1600 Vtaylor Dallas, Texas 75235 Attn: Margie Borne	
209	Agency for Reporting Purposes	Airbusmax company (long run temp) 202	
210	D.C. Agency for Services of Recorders per 47 USC 413	CT Corporation System	
211	Telephone number of D.C. agent	(202) 393-1747	
212	Fax number of D.C. agent	(202) 393-1760	
213	E-mail of D.C. agent		
214	Complete business address of D.C. agent for bond services of equipment	1025 Vermont Avenue, N.Y. Washington, D.C. 20005	
215	Alternate Agent for Services of Recorders (optional)		
216	Telephone number of alternate agent		
217	Fax number of alternate agent		
218	E-mail of alternate agent		
219	Complete business address of alternate agent for bond services of equipment		

PERSONS WHOSE NAMES ARE LISTED IN THIS WORKSHEET CAN BE REACHED BY PNE OR BIPROCESSOR UNDER TITLE 19 OF THE UNITED STATES CODE, 19 B.T.C. 9001

FCC Form 678-A
February 2000

2008 FCC Form 484A Telecommunications Reporting Worksheet

Page 3

Line	Description	U.S. Republic	Communications		Domestic	International
			Revenue	Expenses		
307	Far 484B from line 301	U.S.				
308	Legal fees of reporting entity from line 307					
<p>Report Item: Revenue for January through December 31, 1998 Do not report any negative amounts. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts in whole dollars.</p>						
<p>See instructions regarding report filer's tax treatment. Revenue from services provided for foreign by Other Countries to Federal Universal Service Support Obligations</p>						
End-user:						
309	Monthly service, local calling, connection charges, service features, and other local exchange services including advertising for 4-1-1 POC charged to POC:					
1	Provided in commercial network, interstate					
2	Provided in other network					
3	Provided in other network					
304	Payphone charges for originating or terminating calls:					
1	Provided under state or federal common law					
2	Provided in commercial network, interstate					
3	Provided in other network					
305	Local exchange toll & special access					
306	Payphone expenditures from toll carriers					
307	Other local exchange-related services revenue					
308	Universal service support for long distance from Federal or State sources					
<p>Apply service factor table below, unless a formula and formula method is used: 309 Monthly, activation, and message-charges except toll</p>						
<p>28-29 None</p>						
<p>30 None</p>						
<p>31 None</p>						
<p>32 None</p>						
<p>33 None</p>						
<p>34 None</p>						
<p>35 None</p>						
<p>36 None</p>						
<p>37 None</p>						
<p>38 None</p>						
<p>39 None</p>						
<p>40 None</p>						
<p>41 None</p>						
<p>42 None</p>						
<p>43 None</p>						
<p>44 None</p>						
<p>45 None</p>						
<p>46 None</p>						
<p>47 None</p>						
<p>48 None</p>						
<p>49 None</p>						
<p>50 None</p>						
<p>51 None</p>						
<p>52 None</p>						
<p>53 None</p>						
<p>54 None</p>						

FCC Form 484-A February 2002

2000 FCC Form 487A Telecommunications Reporting Worksheet

Page 5

501 File and O Number 1071 811765
 502 Legal name of reporting entity: U.S. Republic Communications, Inc.

Most bills are certified to LIR subscribers and must provide the percentages requested in Line 503 through 510. Filgrawer files that use Line 503 to certify that they are exempt from this requirement must not provide the information.

Percentage of revenue reported in Block 3 and Block 4 listed in each region of the country. Round 0 exclude to nearest whole percentage. Enter 0 if no service was provided in the region.

	Block 3 Carrier Code (b)	Block 4 End-User Revenue (c)
503 South West	0 %	24 %
504 West West	0 %	15 %
505 West Coast	0 %	29 %
506 Mid-Atlantic	0 %	9 %
507 Mid-West	0 %	11 %
508 Northeast	0 %	4 %
509 Southwest	0 %	12 %
510 Total	0 %	100 %

511 Minimum: Report separately that do not constitute to Universal Service support obligations are included in Block 4. Line 420 bid may be excluded from a Bill's TRF, MURR and LIR certification bases. To have been omitted excluded, the filer has the option of identifying such services below.

Percentages have rounded that do not constitute to Universal Service

PERSON MADE WILLFUL FALSE STATEMENTS IN DEPENDENT CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 24 USC, PART 1

FCC Form 487A
 January 2000

2000 FCC Form 474 - Telecommunications Reporting Worksheet

401 File 474 ID: Form Line 101

011755

U.S. Republic (Commonwealths, Inc.)

402 Legal form of reporting entity: Form Line 102

Section 14 of the regulations provides information on which types of reporting entities are required to file financial payments. Any entity exempt from any of these conditions is required to check the "exempt" box and attach an explanation. The Universal Service administrator will determine which entities meet the criteria. Check off the appropriate exemption provided in Block 4, even if you fail to so certify, below.

403 I certify that the reporting entity is exempt from contributing to:

Universal Service

TRIS

ISUPA

USP Assistance

404 I certify that the reporting entity certifies to the principal and controller and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request reimbursement of the service information provided herein pursuant to Sections 0.102, 0.211, 0.471 and 0.486 of the Commission's Rules.

I certify that I am an officer of the respondent organization; that I have reviewed the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that I do not intend to in any way misstate or the effect of the above-stated company for the purposes outlined here.

Please see the attached certification.

005 Signature

006 Printed name of officer

007 Position with reporting entity

008 Date

009 Title of file

Do not seal sheets with this form. Send this form to: Form 474 of FCC, 39 South Williams Road, Washington, DC 20541
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Administrator: (813) 580-4400 or via e-mail: Form474@fcr.gov
PERSONS MAKING MULTIPLE FILE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, § 1116, FOR

ATTACHMENT D

2000 FCC Form 499A Telecommunications Reporting Worksheet

Approval by OMB
3060-0855

>>> Please read instructions before completing. <<<

Annual Filing - due April 1.

101 Filer 499 ID (If you don't know your number, contact the administrator at (973)-860-4400. If you are a new filer, leave blank and a Filer 499 ID will be assigned to you.)		820411
102 Legal name of reporting entity		Alliance Group Services, Inc.
103 IRS employer identification number		06-1502829
104 Name telecommunications service provider is doing business as		Alliance Group Services, Inc.
105 Principal communications business [Check the one that best describes the reporting entity - see directions. Check one box only.]		
<input type="checkbox"/> CAP/LEC	<input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale)	<input type="checkbox"/> Incumbent LEC
<input type="checkbox"/> Local Reseller	<input type="checkbox"/> Operator Service Provider (OSP)	<input type="checkbox"/> Paging & Messaging
<input type="checkbox"/> Pre-paid Card	<input type="checkbox"/> Private Service Provider	<input type="checkbox"/> Satellite
<input type="checkbox"/> Shared Tenant Service Provider	<input type="checkbox"/> SMR (dispatch)	<input checked="" type="checkbox"/> Toll Reseller
<input type="checkbox"/> Interexchange Carrier (IXC)	<input type="checkbox"/> Other Local	<input type="checkbox"/> Payphone Service Provider
<input type="checkbox"/> Wireless Data	<input type="checkbox"/> Other Mobile	<input type="checkbox"/> Other Toll
If Other Local, Other Mobile or Other Toll is checked, describe carrier type / services provided:		
106 Holding company (All affiliated companies should show name here)		Alliance Group Services LLC
107 FCC Registration Number (FRN) (not required for April 2000 filing)		
108 Management company (if carrier is managed by another entity)		
109 Complete mailing address of reporting entity corporate headquarters		Alliance Group Services, Inc. 1221 Post Rd Westport CT 06880
110 Complete business address for customer inquiries and complaints [if different from address entered on Line 109]		
111 Telephone number for customer inquiries and complaints		(203) - 845-9600
112 All trade names that you use in providing telecommunications services. This should include all names by which you are identified on customer bills.		
a	Alliance Platinum	h
b	USRC	i
c	Telquest Advantage Plus	j
d	Alliance Group Services, Inc.	k
e		l
f		m

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 2

201 Filer 499 ID [from Line 101]	820411
202 Legal name of reporting entity [from Line 102]	Alliance Group Services, Inc.
203 Person who completed this worksheet	Patrick D. Crocker, Attorney
204 Telephone number of this person	(616) - 381-8844
205 Fax number of this person	(616) - 349-8525
206 E-mail of this person	telecomgroup@earlylennon.com
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Patrick D. Crocker, Attorney 900 Comerica Bldg Kalamazoo MI 49007
208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	Patrick D. Crocker, Attorney 900 Comerica Bldg Kalamazoo MI 49007
All carriers must complete Lines 209 through 213	
209 D.C. Agent for Service of Process per 47 U.S.C. 413	Corporation Guarantee & Trust Company
210 Telephone number of D.C. agent	(202) - 296-2222
211 Fax number of D.C. agent	(301) - 229-2783
212 E-mail of D.C. agent	
213 Complete business address of D.C. agent for hand service of documents	1155 15th St NW Ste 502 Washington DC 20005
214 Alternate Agent for Service of Process (optional)	Patrick D. Crocker, Attorney
215 Telephone number of alternate agent	(616) - 381-8844
216 Fax number of alternate agent	(616) - 349-8525
217 E-mail of alternate agent	telecomgroup@earlylennon.com
218 Complete business address of alternate agent for hand service of documents	900 Comerica Bldg Kalamazoo MI 49007

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
February 2000

2000 FCC Form 499A Telecommunications Reporting Worksheet

301 Filer 499 ID [from Line 101] 820411

302 Legal name of reporting entity [from Line 102] Alliance Group Services, Inc.

Report Billed Revenue for January 1 through December 31, 1999
Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.

See instructions regarding percent interstate & international.

Revenue from Service Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms

Fixed local service

303 Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to XCs

a Provided as unbundled network elements

0

b Provided under other arrangements

0

304 Per minute charges for originating or terminating calls

a Provided under state or federal access tariff

0

b Provided as unbundled network elements or other contract arrangement

0

305 Local private line & special access

0

306 Payphone compensation from toll carriers

0

307 Other local telecommunications service revenues

0

308 Universal service support revenue received from Federal or State Sources

0

Mobile service (including wireless telephony, paging & messaging, and other mobile services)

309 Monthly, activation, and message charges except toll

0

Toll service

310 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)

0

311 Ordinary Long Distance (MTS, customer toll free 800/888 service, associated monthly account maintenance, PICC pass-through, and switched services not reported above)

3,555,715

931,597

1,326,282

312 Long distance private line services

0

313 Satellite services

0

314 All other long distance services

0

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