



AccuRoute™
Intelligent Document Routing

Joan

ED(KSKW-SFRTPNBN-CRXT-PADN-BASF-TYKCYRKAHFTP)

Created By: cclime@kelleydrye.com
Created On: 3/1/2012 3:25:46 PM
Expires On: (no expiration)
Single Use? No

Distribution

e-Mail:

JGriffin@KelleyDrye.com PDF

Comments:

Subject:

FileShare:

ED(KSKW-SFRTPNBN-CRXT-PADN-BASF-TYKCYRKAHFTP)

Place this Routing Sheet in Front of Hardcopy Document and then Scan or Fax

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
LOS ANGELES, CA

BRUSSELS, BELGIUM

AFFILIATE OFFICE
MUMBAI, INDIA

FACSIMILE

(202) 342-8451

www.kelleydrye.com

DIRECT LINE: (202) 342-8544

EMAIL: jheitmann@kelleydrye.com

May 18, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: dPi Teleconnect, LLC
Application for Consent to Transfer Control of a Company Holding
Blanket Domestic Section 214 Authority
WC Docket No. 12-32
Ex parte filing

Dear Ms. Dortch:

On Wednesday, May 16, 2012, the undersigned counsel, on behalf of dPi Teleconnect, LLC (“dPi Teleconnect”) and Amvensys Capital Group, LLC (“Amvensys;” with dPi Teleconnect, the “Applicants”), met with William Dever, Jodie May, Dennis Johnson, and Kim Scardino of the Wireline Competition Bureau, as well as Pamela Kane, Pam Slipakoff, and William Kehoe of the Enforcement Bureau, to discuss matters relating to the Application captioned above.

During the meeting, we explained the corporate structure of Amvensys, with reference to the diagram provided in Exhibit A. We also reviewed the 2011 proceedings before the Public Utility Commission of Texas (“PUCT”) concerning the transfer of control of a former Amvensys subsidiary known as dPi Energy, LLC (“dPi Energy”). The matters we discussed with respect to the dPi Energy PUCT proceedings were previously disclosed to the Commission in the Applicants’ March 1, 2012 *ex parte* filing in above-referenced docket.

Finally, we described the business changes and process improvements that the Applicants have made over the last three (3) years. These business changes and process improvements include the following:

KELLEY DRYE & WARREN LLP

Marlene H. Dortch
May 18, 2012
Page Two

- Amvensys replaced the dPi Teleconnect management team that existed at the time of the acquisition with experienced, seasoned professionals, including a new president and CEO, new CFO, new controller, new vice president for information technology, and new operations managers. New dPi Teleconnect President and CEO Chuck Schneider has 26 years of telecommunications experience. Frank Del Col serves as new President and CEO of TAG Mobile, LLC (“TAG Mobile”), another Amvensys subsidiary; he has 29 years of experience in the telecommunications industry. Amvensys expects that these substantial investments in top-level talent will enable it to reinvent and grow dPi Teleconnect, TAG Mobile and other related businesses while ensuring adherence to all applicable state and federal regulatory requirements, including, but not limited to, transfer of control and ETC regulations.
- The Amvensys Legal & Regulatory Department, a shared resource among all Amvensys subsidiaries that currently includes corporate counsel, a regulatory affairs manager, and a regulatory support specialist, regularly consults with dPi Teleconnect’s management team to provide a better flow and exchange of accurate information. Legal & Regulatory reviews and approves all dPi Teleconnect regulatory submissions prior to filing; has developed an efficient in-house document database for all regulatory filings, to ensure better access and control; and meets with dPi Teleconnect and other Amvensys subsidiaries on a weekly basis to review and resolve any outstanding issues such as regulatory filing requirements, customer complaints or state/federal agency data requests. In addition to instituting internal controls to effectuate improved and more accurate regulatory filings, the Department actively reviews the performance of external counsel, and has replaced certain external counsel inherited upon Amvensys’ acquisition of dPi Teleconnect, including the regional counsel who failed to advise dPi Teleconnect of the domestic Section 214 transfer of control filing obligation. The Department strives to use well-regarded and experienced counsel who are experts in the fields of representation for which they are engaged. The Legal & Regulatory team continually interacts with outside counsel to direct activities and serves as a liaison to the Amvensys companies for outside counsel.
- To further bolster the Legal & Regulatory Department, Amvensys is currently interviewing candidates for a General Counsel and other senior regulatory and compliance positions. In particular, dPi Teleconnect has been interviewing for a Corporate Regulatory and Compliance Director,

KELLEY DRYE & WARREN LLP

Marlene H. Dortch
May 18, 2012
Page Three

whose new position will be responsible for managing state and federal regulatory compliance filings for the Amvensys companies.

- dPi Teleconnect and TAG Mobile have invested heavily in an integrated OSS platform as well as in new compliance and operational support processes to help ensure compliance with federal and state regulatory requirements, including requirements regarding Lifeline eligibility and enrollment. New compliance processes, manuals and training programs that have been developed for TAG Mobile are presently being modified for adoption by dPi Teleconnect. TAG Mobile's Lifeline Compliance Plan presently is pending approval before the Wireline Competition Bureau in WC Docket Nos. 09-197 and 11-42 and it serves as an example of the new level of sophistication and rigor Amvensys's new management team brings to the area of regulatory compliance. dPi Teleconnect will be filing a Lifeline Compliance plan modeled on the TAG Mobile compliance plan within the next several weeks.

In accordance with the Commission's rules, this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding. Please do not hesitate to contact us, if you have any questions regarding this submission.

Respectfully submitted,

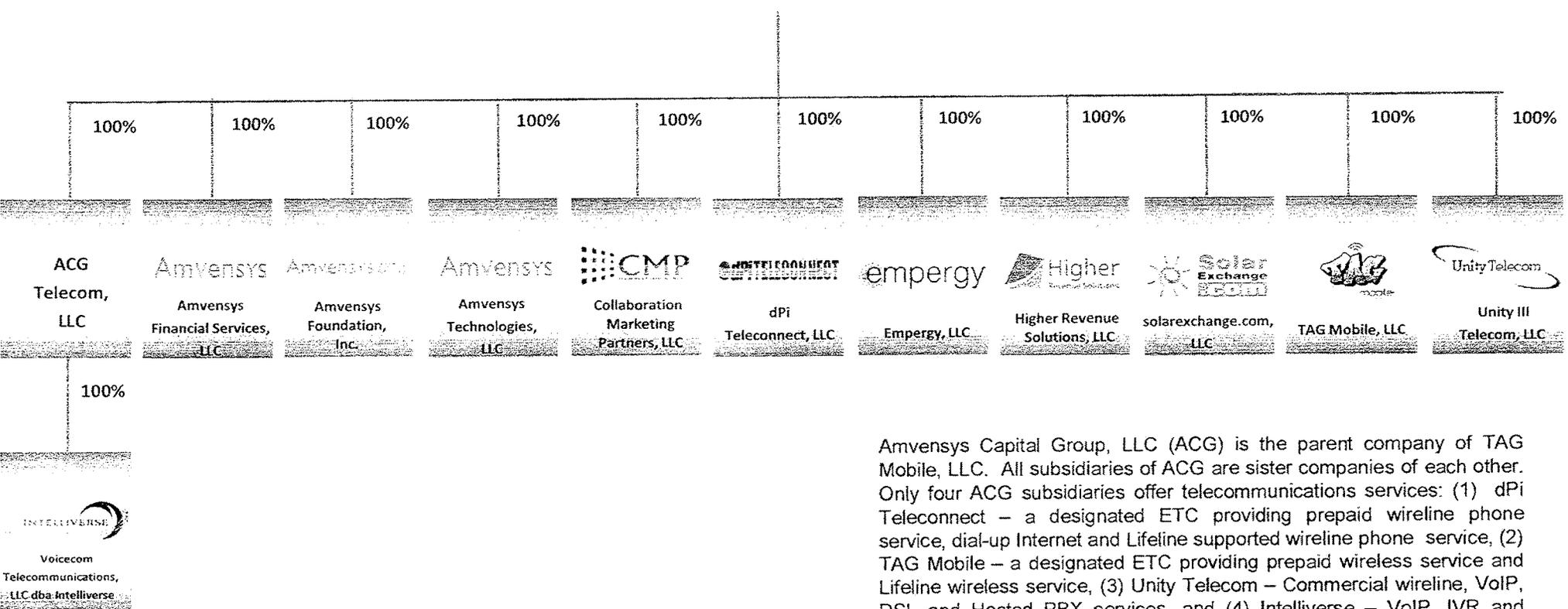


John J. Heitmann
Joan M. Griffin

cc: William Dever
Dennis Johnson
Pamela Kane
William Kehoe
Jodie May
Kim Scardino
Pam Slipakoff
Lawrence Green

Legal Structure

Amvensys Capital Group



Amvensys Capital Group, LLC (ACG) is the parent company of TAG Mobile, LLC. All subsidiaries of ACG are sister companies of each other. Only four ACG subsidiaries offer telecommunications services: (1) dPi Teleconnect – a designated ETC providing prepaid wireline phone service, dial-up Internet and Lifeline supported wireline phone service, (2) TAG Mobile – a designated ETC providing prepaid wireless service and Lifeline wireless service, (3) Unity Telecom – Commercial wireline, VoIP, DSL and Hosted PBX services, and (4) Intelliverse – VoIP, IVR and Hosted PBX services.