7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

REDACTED – FOR PUBLIC INSPECTION

September 27, 2012

By Hand Delivery

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

Re: WC Docket No. 12-233
WCB/Pricing No. 12-09
Direct Case of Smart City Telecommunications, LLC

Dear Ms. Dortch:

John Staurulakis, Inc. hereby files the attached Direct Case on behalf of Smart City Telecommunications, LLC pursuant to the Commission's *Order Designating Issues for Investigation*, DA 12-1430, released August 31, 2012 in the above-referenced docket. The Direct Case is filed as confidential under the Commission's Protective Order.[1] Pursuant to the Protective Order, provided are one copy of the confidential version and two copies of the redacted version. The redacted version has also been filed on the Electronic Comment Filing System.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

John Kuykendall
Vice President
301-459-7590
jkuykendall@jsitel.com

Attachment

cc: Robin Cohn, Pricing Policy Division, via email.

[1] See *In the Matter of Investigation of Certain 2012 Annual Access Tariffs*, WC Docket No. 12-233, WCB/Pricing File No. 12-09, Protective Order, DA 12-1518, rel. Sept. 21, 2012.

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

In the Matter of	)	
	)	WC Docket No. 12-233
Investigation of Certain 2012 Annual	)	
Access Tariffs	)	WCB/Pricing No. 12-09
	)	

DIRECT CASE OF
SMART CITY TELECOMMUNICATIONS, LLC

Smart City Telecommunications, LLC, ("Smart City") pursuant to the August 31, 2012 Designation Order,[1] hereby files its Direct Case in the above-referenced matter.

I. INTRODUCTION

On June 18, 2012, Smart City Telecommunications, LLC, (alternatively "Smart City" or "Company"), through its consultant John Staurulakis, Inc. ("JSI") filed under Transmittal No. 165 of the John Staurulakis, Inc. Tariff F.C.C. No. 1 ("JSI Tariff") revisions in accordance with the Commission's March 28, 2012 release entitled In the Matter of July 3, 2012 Annual Access Charge Tariff Filings, WCB/Pricing File No. 12-07, Order, DA 12-482 ("June 18th filing"). Smart City is an Issuing Carrier of the JSI Tariff.

Smart City elected to file an Access Recovery Charge ("ARC") pursuant to Section 51.917(e), to be effective July 3, 2012, and a Connect America Fund ("CAF") election pursuant to Section 51.917(f). The Company made the appropriate filing on June 18, 2012. On July 2, 2012, the Wireline Competition Bureau released an Order that

[1] Investigation of Certain 2012 Annual Access Tariffs, WC Docket No. 12-233, WCB/Pricing No. 12-09, *Order Designating Issues for Investigation*, DA 12-1430 (rel. August 31, 2012) ("Designation Order").

suspended for one day and set for investigation the ARC rates contained in the 2012 Annual Access Tariff filings of all issuing incumbent local exchange carriers ("ILECs") that charged an ARC, including those filed on behalf of Smart City. Pursuant to the *Designation Order*, Smart City hereby submits the required information and demonstrates that in light of the adjustments discussed in this Direct Case, Smart City's ARC rates are just and reasonable.

The financial information presented in this Direct Case as Exhibit 1, the 2012 ROR ILEC Interstate Rates Worksheet and the 2012 ROR ILEC Intrastate Rates Worksheet,[2] is confidential and is being submitted with this Direct Case in both confidential and redacted versions. Although Smart City is not re-filing its financial information in conjunction with this Direct Case, Smart City has in fact filed a revised Tariff Review Plan with the Commission, subsequent to the June 18th filing, in order to address issues raised by Commission Staff. This filing was submitted as an amendment to JSI Tariff Transmittal No. 165. Accordingly, and in an abundance of caution, Smart City is also filing the appropriate certifications with this Direct Case indicating that this the revised financial information is true and correct to the best of its knowledge, that it was not seeking duplicative recovery, and that it complied with sections 51.917(d), 51.917(e), and 51.917(f) of the Commission's rules.[3] These certifications are being filed in support of the revised Tariff Review Plan that was previously filed with the Commission.

---

[2] Also referred to as the Tariff Review Plan or financial information.

[3] *See* 47 C.F.R. §§ 1.16 (addressing unsworn declarations under penalty of perjury in lieu of affidavits); 51.917(d)(1)(vii) (requiring annual certification from Rate-of-Return carriers obtaining Eligible Recovery that no duplicative recovery is sought); and 51.917(f)(3) (stating that "A Rate-of-Return carrier that elects to receive CAF ICC support must certify with its 2012 annual access tariff filing and on April 1st of each subsequent year that it has complied with paragraphs (d) and (e), and, after doing so, is eligible to receive the CAF ICC support requested pursuant to paragraph (f) of this section").

II. ISSUES DESIGNATED FOR INVESTIGATION

A. Whether LEC has Reasonably Determined the Amount of its Base Period Revenue

1. Fiscal Year 2011 Revenue Determination

A rate-of-return Local Exchange Carrier's ("LEC's") Base Period revenue is made up of three components: 1) its 2011 Interstate Switched Access Revenue Requirement; 2) Fiscal Year 2011 revenues from rate elements included in the definition of Transitional Intrastate Access Service received by March 31, 2012; and 3) Fiscal Year 2011 reciprocal compensation revenues received by March 31, 2012, less Fiscal Year 2011 reciprocal compensation payments made by March 31, 2012 (net reciprocal compensation revenues). Base Period Revenue also includes revenues from non-recurring charges associated with the switched access services in question.

Smart City bills its carrier access bills ("CABs") on a mid-month cycle. Consequently, intrastate terminating billing usage reflected in the June 18th filing for Smart City was based on the time period from September 22, 2010 through September 21, 2011 and not the October 1, 2010 through September 30, 2011 Fiscal Year put forth by the Commission. Although this time period does not align exactly with the October 2010 through September 2011 Fiscal Year noted above, the nine day variance in the time frames has a de minimus impact on the Base Period Revenues included in the June 18th filing. The CABs are used to ensure that the revenues are for services provided during Fiscal Year 2011, eliminate billed revenues not related to services provided such as late fees which are identified separately on the CABs and to make certain that billed revenues were collected by March 31, 2012.

The effort involved in subtracting and adding nine days to Smart City's CABs billed revenues time frame reflected in the June 18th filing in order to match identically with the October 1, 2010 through September 30, 2011 Fiscal Year designated by the Commission, is unwarranted given the minimal impact such an adjustment will have on the Base Period Revenue amount. By way of an example, and to help quantify the impact of such an adjustment, Fairpoint Telephone Companies indicated in a recently filed Amended Transmittal No. 31, Supplement to Description and Justification filing that such an adjustment using the designated Fiscal Year would result in a less than one percent increase.[4]

Smart City asserts that in light of the fact that there is only a nine day variance between Smart City's intrastate terminating billing usage time frame of September 22, 2010 through September 21, 2011 and the October 2010 through September 2011 Fiscal Year put forth by the Commission, like Fairpoint, the effort and expense associated with making this adjustment to "calendarize" this data is unwarranted when considering the minimal impact this adjustment will likely have on the ultimate ARC computation.

2. Non-recurring charges inclusions and eliminations

Smart City does not have any non-recurring charges associated with the services in question. As a result, Base Period Revenue is not impacted by non-recurring charges. Non-recurring charges not related to these services were also excluded from the billed revenues used in the June 18th filing and in this Direct Case.

[4] See the Fairpoint Telephone Companies Amended Transmittal No. 31, Supplement to Description and Justification, filed July 30, 2012. See also In the Matter of *July 3, 2012 Annual Access Tariff Filings*, WCB/Pricing No. 12-07, Order, DA 12-482 (Wireline Comp. Bur., rel. March 28, 2012).

B. Whether LEC has Reasonably Calculated its Required Intrastate Rate Reductions

Smart City has followed the appropriate procedure when determining its required intrastate rate reductions for the purposes of the June 18th filing, and for this Direct Case, and is not subject to review of this issue as outlined in the Commission's *Designation Order*.

C. Whether LEC has Reasonably Estimated its Projected Interstate and Intrastate Switched Access Demand

LECs were directed to use existing demand estimation methods to project demand for the 2012-2013 tariff period. In calculating the Eligible Recovery, a LEC must also subtract certain projected intrastate and interstate access revenues from its Base Period

Please reference Exhibit 1. As indicated on the 2012 ROR ILEC Interstate Rates Worksheet, the LSS amount reflected in cell F-7 is [redacted] and the projected annual percentage rate of demand change reflected in the calculation of the amount in cell F-10 is -0.36 percent. As indicated on the 2012 ROR ILEC Intrastate Rates Worksheet, the projected annual percentage rate of demand change reflected in the calculation of the amount in cell G-9 is -0.71 percent. This review indicates that Smart City's projected interstate and/or intrastate demand loss is less than an annualized rate of fifteen percent. Accordingly, Smart City falls within the "safe harbor" of fifteen percent and no further action is warranted.

D. Whether NECA's Allocation of Projected Pool Interstate Switched Access Revenues Based on Projected Switched Access Billed Revenues was Reasonable

Not applicable to Smart City Telecommunications, LLC.

E. Whether the Suspended Access Recovery Charge Rates are Just and Reasonable and, if not, the Process for Requiring Refunds

Please reference Exhibit 2 which is a Table reflecting Smart City's filed ARC rates and the ARC rates supported by this Direct Case. In this Direct Case, Smart City reaffirms the ARC rates that were established in the June 18th filing and asserts that the ARC rates established in the June 18th filing were just and reasonable. Smart City is also filing Exhibit 3 with this Direct Case, which is the completed Tariff Review Plan showing the calculation of its ARC rates. In light of the fact that no changes are being proposed to the ARC rates calculations, this Tariff Review Plan will not be re-filed and Smart City will not be filing revised ARC rates with the Commission in conjunction with this Direct Case.

III. CONCLUSION

Smart City presents this Direct Case in compliance with the aforementioned August 31, 2012 *Designation Order*. Smart City has reasonably determined the amount of its Base Period Revenue, reasonably calculated its required intrastate rate reductions, and reasonably estimated it projected interstate and intrastate switched access demand.

Accordingly, and in light of the adjustments described in this Direct Case, Smart City's suspended ARC rates are just and reasonable and are reaffirmed by this Direct Case.

Respectfully submitted,

September 27, 2012

Smart City Telecommunications, LLC

/s/ James Schumacher
James Schumacher
Vice President Finance & Administration
P.O. Box 22555
Lake Buena Vista, FL 32830

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EXHIBIT 1

- 2012 ROR ILEC Interstate Rates Worksheet
- 2012 ROR ILEC Intrastate Rates Worksheet

	A	B	C	D	E	F	G	H
1	**Filing Date:**		18-Jun-12					
2	**Filing Entity:**		Smart City Telecom, LLC					
3	**Transmittal Number:**		165					
4	**COSA:**		210330					
5								
6								
7	**Most Recently Filed Interstate Switched Access Revenue Requirement**				**Input**	[redacted]		
8	**TY 2012-2013 Baseline Adjustment Factor (BAF)**					0.95		
9	**BAF X Most Recently Filed Interstate Switched Access Revenue Requirement**				**F7*F8**	[redacted]		
10	**Total TY 2012-2013 Expected Maximum Interstate Revenue**				**Sum of Col. H**	[redacted]		
11	**TY 2012-2013 Interstate Eligible Recovery**				**F9-F10**	[redacted]		
12								
13								
14	**Interstate Tariff Section**	**USOC**	**Interstate Switched Access Rate Element**	**Unit of Demand (e.g., MOU or DS1)**	**12/29/11 Interstate Rate**	**7/1/2012 Proposed Rate**	[redacted]	
15	**Input**	**Input**	**Input (Note 1)**	**Input**	**Input**	**Input**		
16			**** LOCAL SWITCHING ****					
17	17.2.3 (A)		Local Switching	MOU	$ 0.003900	[redacted]		
18								
19								
20								
21								
22			**** INFORMATION ****					
23			Info Surcharge (Per 100 MOU)	MOU	$ -	[redacted]		
24								
25								
26								
27								
28			**** TANDEM-SWITCHED TRANSPORT AND TANDEM ****					
29	17.2.2		Tandem Switching Facility	MOU per Mile	[redacted]	$ 0.000021		
30	17.2.2		Tandem Switched Termination	MOU per Term	[redacted]	$ 0.000714		
31	17.2.2		Tandem Switching		[redacted]	$ 0.000177		
32								
33								
34			**** SIGNALING FOR TANDEM SWITCHING ****					
35								
36								
37								
38								
39								
40			**** DIRECT-TRUNKED TRANSPORT ****					
41	17.2.2		DIRECT TRANSPORT FAC	DS1's per Mile	[redacted]	$ 5.57		
42	17.2.2		DIRECT TRANSPORT TERM	DS1's per Term	[redacted]	$ 40.75		
43								
44								
45								
46			**** DEDICATED SIGNALING TRANSPORT ****					
47								
48								
49								
50								
51								
52			**** ENTRANCE FACILITIES ****					
53	17.2.2		ENTRANCE FACILITY-FG ABCD	DS1's	[redacted]	$ 100.70		
54								
55								
56								
57								
58			**** LINE INFORMATION DATABASE ****					
59	17.2.2		800 QUERY-BASIC-FGD	Query's	$ 0.0051	$ 0.0051		
60	17.2.2		800 QUERY- VERTICAL-FGD	Query's	$ 0.0056	$ 0.0056		
61								
62								
63								
64			**** BILLING NAME AND ADDRESS ****					
65								
66								
67								
68								
69								
70								
71	**Total TY 2012-2013 Expected Maximum Interstate Revenue (Sum of Col. H)**							
72								
73								
74	Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.							

1	**Filing Date:**	18-Jun-12
2	**Filing Entity:**	Smart City Telecom, LLC
3	**Transmittal Number:**	165
4	**COSA:**	210330

7	**Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements**	**Sum of Col. O**
8	**95% of Total FY 2011 Actual Revenue for Transitional Intrastate Access Service Rate Elements**	**Sum of Col. P**
9	**Total TY 2012-2013 Expected Maximum Transitional Intrastate Access Service Revenue**	**Sum of Col. R**
10	**Total TY 2012-2013 Intrastate Eligible Recovery**	**Sum of Col. S**

13	Intrastate Tariff Section	Interstate Tariff Section	USOC	Intrastate and Interstate Switched Access Rate Elements for Transitional Intrastate Access Service Categories	Unit of Demand (e.g., MOU or DS1)	12/29/2011 Intrastate Rate	12/29/2011 Interstate Rate
14	Input	Input	Input	Input (Note 1)	Input	Input	Input
15				** TERMINATING END OFFICE ACCESS SERVICE **			
16				Terminating Carrier Common Line			
17	E.3.10.A.2.(d)	NA		Carrier Common Line	MOU	$ 0.038200	$ -
18	E16.4.A.2.(d)	NA		MABC Carrier Common Line	MOU	$ 0.038200	$ -
19							
20							
21							
22				Terminating Local Switching			
23	E.6.8.2.A.1.(i)	17.2.3 (A)		Local Switching	MOU	$ 0.017700	$ 0.003900
24	E16.4.C.6.(d)	NA		MABC Local Switching	MOU	$ 0.017700	$ 0.003900
25	E16.4.C.1.(b)	NA		MABC Local Channel	MOU	$ 0.000619	$ -
26							
27							
28				Terminating Other (e.g., information surcharge, Transport or Residual Interconnection Charges)			
29	NA	NA		Info Surcharge (Per 100 MOU)	MOU	$ -	$ -
30	E.6.8.1.O.1.(g)	NA		Residual Interconnection Charge (RIC)	MOU	$ 0.012120	$ -
31							
32							
33							
34				** TERMINATING TANDEM-SWITCHED TRANSPORT ACCESS SERVICE **			
35				Terminating Tandem-Switched Common Transport			
36	E.6.8.1.M.1.(a)	17.2.2		Tandem Switching Facility	MOU per Mile	$ 0.000040	$ 0.000021
37	E.6.8.1.M.2.(a)	17.2.2		Tandem Switched Termination	MOU per Term	$ 0.000360	$ 0.000714
38	E16.4.C.3.(b)	17.2.2		MABC Tandem Switched Termination	MOU per Term	$ 0.000360	$ 0.000714
39							
40							
41				Terminating Tandem Switching			
42	E.6.8.1.N.1.(a)	17.2.2		Tandem Switching	MOU	$ 0.000500	$ 0.000177
43	E16.4.C.4.(a)	17.2.2		MABC Tandem Switching	MOU	$ 0.000500	$ 0.000177
44							
45							
46							
47				** ORIGINATING AND TERMINATING DEDICATED TRANSPORT ACCESS SERVICE **			
48				Originating and Terminating Entrance Facilities			
49	E.6.8.1.J.2.(a)	17.2.2		ENTRANCE FACILITY-FG ABCD	DS1's	$ 133.81	$ 100.70
50							
51							
52							
53							
54				Originating and Terminating Tandem-Switched Dedicated Transport			
55							
56							
57							
58							
59							
60				Originating and Terminating Direct-Trunked Transport			
61	E.6.8.1.L.3.(a)	17.2.2		DIRECT TRANSPORT FAC	DS1's per Mile	$ 16.75	$ 5.57
62	E.6.8.1.L.3.(b)	17.2.2		DIRECT TRANSPORT TERM	DS1's per Term	$ 29.87	$ 40.75
63	E.4.6.A.1.(i)	NA		CAPACITY CHARGES	Trunks / BHMO	$ 1.29	$ -
64	E16.4.C.5.(i)	NA		MABC Interconnection	MOU	$ 0.042500	$ -
65	E16.4.B.1.(i)	NA		MABC Capacity Charges BHMOC	Trunks / BHMO	$ 1.29	$ -
66							
67	**Total**						
68							
69							

70 Note 1: Enter one rate element per line under the relevant category. Insert rows as necessary.

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EXHIBIT 2

Initial ARC Rate and Direct Case ARC Rate

Comparison Table

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SMART CITY TELECOMMUNICATIONS, LLC

Exhibit 2

Initial ARC Rate and Direct Case ARC Rate Comparison Table

	Initial ARC Rate	Direct Case ARC Rate
Primary Residential or Single Line Business End User Common Line Charge	**$0.50**	**$0.50**
Multi-Line Business End User Common Line Charge	**$1.00**	**$1.00**

Excludes Lifeline Customers

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EXHIBIT 3

Tariff Review Plan

Calculation of ARC Rates

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '): 6/18/2012
Holding Company:
Filing Name: Smart City Telecom, LLC

ARCRCTRP-CAF-1

Rate Ceiling Component Charges Calculation (51.915(b)(11))

Study Area	EXCHANGES	[redacted]	RESIDENCE / NP / BRI / SLB (excluding Lifeline)									[redacted]	MULTI-LINE BUSINESS
			Stand-alone R1 rate	Mandatory EAS	Mandatory Zone Charges	State SLC	E911	TRS	State USF	Federal SLC	Total Rate Ceiling Comp. Chgs		Federal SLC-MLB
210330	Celebration		$ 11.47	$ -	$ -	$ -	$0.50	$0.11	$0.00	$6.50	$18.58		$ 9.20
210330	LBV		$ 7.35	$ -	$ -	$ -	$0.50	$0.11	$0.00	$6.50	$14.46		$ 9.20

REDACTED VERSION FOR PUBLIC REVIEW

Filing Date (enter w/leading '): 6/18/2012
Holding Company:
Filing Name: Smart City Telecom, LLC

ARCRCTRP-CAF-2

Eligible Revenue - Current Yr Recovery		
Maximum Imputed ARC Revenue		
Tariffed ARC Revenue	[redacted]	
Expected CAF ICC Support	$	2,779,029

Eligible Revenue - Current Yr Recovery	[redacted]
Tariffed ARC Revenue + Expected CAF ICC Support	

Residential Rate Ceiling: (51.915(b)(12))	$	30.00
Maximum MLB SLC+ARC (51.915(e)(5)(iv))	$	12.20
Max ARC for current year: Res/SLB	$	0.50
Max ARC for current year: MLB	$	1.00

Totals [redacted]

Exchange/RG		RESIDENCE / NP / BRI / SLB (excluding Lifeline)					MULTI-LINE BUSINESS					
	[redacted]	Residential Total Rate Ceiling Chgs	RES/NP/BRI Current Year Maximum ARC Rate	RES/NP/BRI Current Year Tariffed ARC Rate	SLB Tariffed ARC Rate	[redacted]	[redacted]	MLB Federal SLC	MLB Curr. Yr. Maximum ARC Rate	NonCentrex Tariffed ARC Rate	Centrex Tariffed ARC Rate	[redacted]
Celebration	[redacted]	$ 18.58	$ 0.50	$ 0.50	$ 0.50	[redacted]	[redacted]	$ 9.20	$ 1.00	$ 1.00	$ 1.00	[redacted]
LBV	[redacted]	$ 14.46	$ 0.50	$ 0.50	$ 0.50	[redacted]	[redacted]	$ 9.20	$ 1.00	$ 1.00	$ 1.00	[redacted]
0	[redacted]	$ -	$ 0.50	$ 0.50	$ 0.50	[redacted]	[redacted]	$ -	$ 1.00	$ 1.00	$ 1.00	[redacted]

Certification of Officer for Rate-of-Return Carrier Eligibility for CAF/ICC Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier on this form certifies that it has complied with Eligible Recovery §51.917(d) and Access Recovery Charge §51.917(e) and is eligible to receive the CAF ICC support requested pursuant to §51.917(f).

Name of Reporting Carrier	**Smart City Telecommunications LLC d/b/a Smart City Telecom**				
Signature of Authorized Officer				Date 9-24-2012	
Printed name of Authorized Officer	James Schumacher				
Title or position of Authorized Officer	VP Finance & Administration				
Telephone number or Authorized Officer.	(407) 828-6656				
Study Area Code of Reporting Carrier	**210330**		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification of Officer for Rate-of-Return Carrier Not Seeking Duplicative Recovery

I certify that I am an officer of the reporting carrier and that, to the best of my knowledge, the reporting carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism as per §51.917(d)(vii).

Name of Reporting Carrier	**Smart City Telecommunications LLC d/b/a Smart City Telecom**				
Signature of Authorized Officer	James Schumacher			Date 9-24-2012	
Printed name of Authorized Officer	James Schumacher				
Title or position of Authorized Officer	VP Finance & Administration				
Telephone number or Authorized Officer.	(407) 828-6656				
Study Area Code of Reporting Carrier	**210330**		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification of Officer as to the Accuracy of the CAF ICC Data Reported

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual data reported; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	**Smart City Telecommunications LLC d/b/a Smart City Telecom**				
Signature of Authorized Officer	James J. Schumacher			Date 9-24-2012	
Printed name of Authorized Officer	James Schumacher				
Title or position of Authorized Officer	VP Finance & Administration				
Telephone number or Authorized Officer.	(407) 828-6656				
Study Area Code of Reporting Carrier	**210330**		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification of Officer
to Authorize an Agent to File Data on Behalf of Reporting Carrier

I certify that (Name of Agent) John Staurulakis, Inc. (JSI) is authorized to submit information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data provided to the Authorized Agent; and, to the best of my knowledge, the actual data provided to the Authorized Agent are accurate.

Name of Authorized Agent	John Staurulakis, Inc. (JSI)				
Name of Reporting Carrier	**Smart City Telecommunications LLC d/b/a Smart City Telecom**				
Signature of Authorized Officer	James J. Schumacher			Date 9-24-2012	
Printed name of Authorized Officer	James Schumacher				
Title or position of Authorized Officer	VP Finance & Administration				
Telephone number or Authorized Officer.	(407) 828-6656				
Study Area Code of Reporting Carrier	**210330**		Filing Due Date for this form (mm/dd/yyyy)	09/27/2012	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.