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Via Electronic Delivery
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April 15, 2014

Mr. David Danner
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive
Olympia, WA 98504-7250

RE: Notification Regarding the Acquisition by Business Discount Plan, Inc. of the
Customers of Central Telecom Long Distance, Inc.

Dear Mr. Danner:

Pursuant to WAC 480-120-147,¹ Business Discount Plan, Inc. (“BDP”) and Central Telecom Long Distance, Inc. (“CTLTD”) (jointly “the Companies”), hereby notify the Washington Utilities and Transportation Commission (“Commission”) that BDP is acquiring selected Washington customers of CTLTD, through a mutually negotiated customer base acquisition (“Transaction”). As a result of the Transaction, certain CTLTD Washington customers will be transferred to BDP, which will become the interexchange service provider for those customers.

As described below, the Transaction will be virtually transparent to transferred customers of CTLTD in terms of the services that those customers receive and the rates and terms of those services currently provided by CTLTD. CTLTD will maintain its current operating authority in order to redirect its telecommunications market focus in Washington and elsewhere, and continue to assume attendant regulatory obligations.

It is the Companies understanding that prior Commission action is not required for the Companies to complete the Transaction. This notification is provided for informational purposes only. In support of this notification, the Companies provide the following information:

¹ Washington Administrative Code (“WAC”) [480-120-147](#), Changes in local exchange and intrastate toll services..

Introduction.

On January 30, 2014, BDP and CTLD entered into a customer base acquisition agreement whereby CTLD agreed to sell, and BDP agreed to acquire, a portion of CTLD's commercial and residential intraLATA and interLATA interexchange customers located in Washington and certain other jurisdictions served by the Companies. Under the terms of the Transaction, BDP is to provide transferred CTLD customers the same services at the same rates, terms and conditions provided by CTLD. The Transaction became effective on or about March 1, 2014, following regulatory approvals where required.²

CTLD has made an affirmative business decision to redirect its market focus and to sell a portion of its existing customer base in order to concentrate its efforts on a different segment of the telecommunications market in Washington and elsewhere. To that end, CTLD will continue to operate in the State of Washington and comply with attendant regulatory obligations following the transfer of its customers to BDP.

Description of the Parties.

Business Discount Plan. BDP is a privately-held corporation organized under the laws of the State of California on August 18, 1992 with business address at One World Trade Center, Suite 800, Long Beach, CA 90831. BDP is a provider of non-facilities-based resold of interLATA and intraLATA interexchange telecommunications services to commercial and residential customers in Washington and throughout the U.S. BDP has operated in the State of Washington since November 1995.³

Central Telecom Long Distance, Inc. CTLD is a privately-held corporation organized under the laws of the State of Colorado on December 21, 2007 with business address at 102 South Tejon Street, 11th Floor, Colorado Springs, CO 80903. CTLD is a provider of non-facilities-based resold of interLATA and intraLATA interexchange telecommunications services to commercial and residential customers in Washington and throughout the U.S. CTLD has operated in the State of Washington since November 2008.⁴

Description of the Transaction.

Pursuant to a Customer Base Purchase and Sale Agreement ("Agreement"), dated January 30, 2014 (the "Agreement"), BDP will acquire certain, but not all, CTLD customer accounts, to the extent permitted under applicable law and regulations, certificates, licenses, registrations or other authorizations to provide intrastate, interstate, and international telecommunications services.

² It was just determined that Washington customers would be affected by the Transaction, and is the basis for this late notification.

³ Pursuant to registration granted in Docket No. UT-951235 and 951307 (November 22, 1995)..

⁴ Pursuant to registration granted in Docket No. UT-081824 (November 7, 2008).

Mr. David Danner
April 15, 2014
Page 3

The Agreement and transfer became effective March 1, 2014, or upon approval by regulatory agencies in those jurisdictions where the Company's operate and where such authority was required. CTLD will assign to BDP those customers for which the Companies have agreed upon and applicable governmental approvals have been obtained. In the interest of assuring seamless and uninterrupted service, all assigned customers will continue to receive service from BDP under the same rates, terms and conditions of services as were previously provided by CTLD. BDP will initially concur in CTLD's existing tariffs or service guides and will subsequently provide service to former CTLD subscribers under BDP's amended tariffs or service guides.

Notification of the Transaction was provided to Customers via direct mail, and to the Federal Communications Commission ("FCC") pursuant to Section 64.1120(e) of the FCC's Rules,⁵ on January 31, 2014.⁶ A copy of the Customer notice sent to CTLD customers is appended at **Exhibit A**.

Company Contacts.

Questions or ongoing correspondence, orders, or other Commission communications should continue to be directed to the following individuals:

For Business Discount Plan, Inc.:

Craig Konrad, President
Business Discount Plan, Inc.
One World Trade Center
Suite 800
Long Beach, CA 90831
Telephone: 949.798.7040

For Central Telecom Long Distance, Inc.:

Deborah Baker
President
Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor,
Colorado Springs, CO 80903
Telephone: 719.471.2263

⁵ 47 C.F.R. §64.1120(e)

⁶ See, Notification of Central Telecom Long Distance, Inc. Customer Base Acquisition Pursuant to 47 C.F.R. §64.1120(e), *In the Matter of 2000 Biennial Review - Review of Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers.*, CC Docket No. 00-257 (January 31, 2014).

Mr. David Danner
April 15, 2014
Page 4

Public Interest Considerations.

Petitioners respectfully submit that the proposed Transaction serves the public interest. The Transaction will result in the assignment of CTLD customers to an existing long-standing company with established operating history in the State that will continue to provide telecommunications services to transferred customers without interruption. Further the proposed Transaction is structured to assure an orderly transition of customers from CTLD to BDP. The terms and conditions of the Transaction are equitable to both parties. Further, the Transaction will not affect the public in Washington.

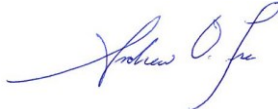
In accordance with the terms of their service contracts and the rules and procedures of the FCC and applicable state(s), including this Commission, customers have been properly notified of the proposed transaction and the change in their telecommunications provider from Consumer to BDP. BDP and CTLD have provided customers with more than 30 days advanced notice of the transfer pursuant to Section 64.1120(e) of the FCC's rules, 47 C.F.R. §64.1120(e). Notification of the transaction has also been provided to the FCC pursuant to 47 C.F.R. §64.1120(e).

For the reasons set forth above, the Companies respectfully request that the Commission grant all authority necessary for Business Discount Plan, Inc. to acquire certain customers of Central Telecom Long Distance, Inc.

Please acknowledge receipt and acceptance of this submission. Thank you for your attention to this matter. Questions may be directed to Andrew Isar at 253.851.6700.

Respectfully submitted,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to
Business Discount Plan, Inc.



Deborah Baker
Central Telecom Long Distance, Inc.
102 South Tejon Stree, 11th Floor
Colorado Springs, CO
Telephone 719.471.2265

Enclosures

EXHIBIT A

Customer Notice

BUSINESS DISCOUNT PLAN, INC.

One World Trade Center Suite 800 Long Beach CA 90831

<http://www.interstatebdprate.net/>

Notice of Carrier Change

January 31, 2014

Dear Valued Central Telecom Long Distance, Inc. Customer:

Great news for your long distance service! Following a reevaluation of its business focus, your current long distance company, Central Telecom Long Distance, Inc. ("CTLTD") has entered into an agreement with Business Discount Plan, Inc. ("BDP") to acquire certain business holdings. **As a result, Business Discount Plan, Inc., will automatically become your new long distance telecommunication services provider after March 3, 2014.** (The specific date(s) of the transfer of your interstate and intrastate telephone services may differ depending upon when we receive the applicable federal and state regulatory approvals.)

Please rest assured that the transaction will not affect the services you currently receive. You will continue to receive services with the same rates, features, terms, and conditions as you currently enjoy, with the added convenience of receiving one bill through your local telephone company, where available. In the event that changes are made to your service you will be notified by separate mailing thirty (30) days prior to the changes becoming effective.

You will not be responsible for any charges associated with the transfer of your account. All charges associated with the transfer to BDP will be borne by BDP. Although you have the right to select the carrier of your choice, we value your business and hope that BDP may continue to serve you. If you should choose another telephone provider you will need to contact that carrier directly to arrange for the change prior to the transfer of your services to BDP and also provide BDP with notice per existing service terms. It can take several weeks for a new carrier to make the switch and you may also incur service initiation fees from that provider such as service order, installation and other similar charges associated with establishing a new service account.

If you currently have a preferred carrier freeze on your account you will still be automatically transferred to BDP on the effective date unless you have selected another carrier before the effective date. To arrange a new freeze or confirm an existing freeze, you must contact your local service provider.

BDP will be responsible for responding any customer inquiries prior to and during the transfer of service from CTLTD to BDP. **BDP's toll free customer service number for BDP is 800-680-1120, which will remain the same after your services are transferred.**

You can trust that you will be provided with the same quality service to which you have grown accustomed with CTLTD. We welcome you to BDP and look forward to meeting all your long distance communication needs. Please visit the web site <http://www.interstatebdprate.net/> for more information.

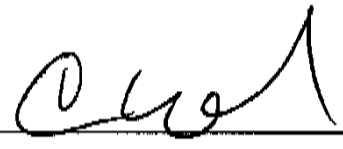
Sincerely,

The Product Management Team
Business Discount Plan, Inc.

STATE OF CALIFORNIA)
)
COUNTY OF ORANGE)

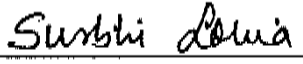
VERIFICATION

I, Craig Konrad, state that I am President of Business Discount Plan, Inc. (“BDP”); that I am authorized to make this verification on behalf of BDP; that the foregoing filing was prepared under my direction and supervision; and that, with respect to BDP, the same are true and correct to the best of my knowledge, information, and belief.

By: 

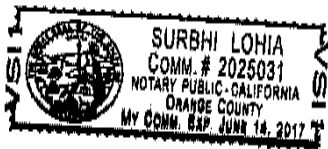
Craig Konrad
President
Business Discount Plan, Inc.
One World Trade Center
Suite 800
Long Beach, CA 90831
Telephone: 949.798.7040

Subscribed and Sworn to me this 14th day of April, 2014


Notary Public

My Commission Expires June 14, 2017

SEAL



STATE OF ARIZONA)
)
COUNTY OF YAVAPAI)

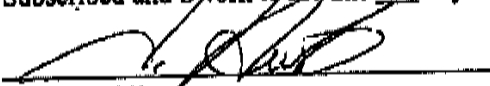
VERIFICATION

I, Deborah Baker, state that I am President of Central Telecom Long Distance, Inc. ("CTLD"); that I am authorized to make this verification on behalf of CTLD; that the foregoing filing was prepared under my direction and supervision; and that, with respect to CTLD, the same are true and correct to the best of my knowledge, information, and belief.

By: 

Deborah Baker
President
Central Telecom Long Distance, Inc.
102 South Tejon Street
11th Floor
Colorado Springs, CO 80903
Telephone: 719.471.2265

Subscribed and Sworn to me this 10th day of April, 2014


Notary Public

My Commission Expires April 19, 2016

SEAL

