



COMTECH21

Communications Technology for the 21st Century

RECEIVED

JUL 07 2000

PUBLIC SERVICE
COMMISSION

July 5, 2000

Kentucky Public Service Commission
730 Schenkel Lane
P.O. Box 615
Frankfort, Kentucky 40602

05154600
0510

Dear Sir or Madam:

This letter covers the application of COMTECH 21, LLC for authority to resell telecommunications services within the State of Kentucky.

Enclosed are the following:

- 1) Application for Certificate of Public Convenience and Necessity and Exhibits.
- 2) Proposed tariff.

Please confirm in writing receipt of Application for Registration in self-addressed stamped address.

Contact person for COMTECH 21, LLC is:

Marian DiNicola
One Barnes Park South
Wallingford, CT 06492
(203)679-7293
E-Mail mdinicola@Profitecinc.com

Thank you for your consideration of this application.

Sincerely yours,

Marian DiNicola
Regulatory Compliance Administrator

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE COMMONWEALTH OF KENTUCKY**

Application of

COMTECH 21, LLC

for Certificate of Interexchange
Service Authority

Docket No. _____

APPLICATION FOR AUTHORIZATION

COMTECH 21, LLC ("COMTECH 21, LLC" or applicant"), by its undersigned agent, hereby submits its application seeking authority to operate as a reseller of interexchange intrastate-switched access telecommunications services in the Commonwealth of Kentucky. In support thereof, COMTECH 21, LLC provides the following information, as well as a proposed initial tariff:

1. The name and business address of the Applicant is:

COMTECH 21, LLC
One Barnes Park South
Wallingford, CT 06492

2. Correspondence regarding this application should be directed to:

Marian DiNicola
COMTECH 21, LLC
One Barnes Park South
Wallingford, CT 06492

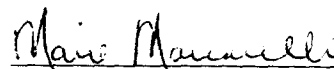
3. The Applicant is a corporation formed and existing under the laws of Delaware. A copy of the Applicant's certificate of incorporation is attached hereto as Exhibit 1.
4. A list of the principal officers and directors of the Applicant, who have extensive technical, financial, and management skills with which to carry out the business described herein, is attached hereto as Exhibit 2. Descriptions of the business experience of COMTECH 21, LLC's principal officers are attached hereto as Exhibit 3.
5. COMTECH 21, LLC plans to provide telecommunications services as a reseller of switched, Equal Access virtual private network services provided by other Kentucky-approved interexchange carriers.
6. The Applicant's accounting practices conform to "GAAP" (Generally Accepted Accounting

Principles).

7. COMTECH 21, LLC has adequate financial ability to support the proposed services. Because COMTECH 21, LLC will only use existing switching equipment owned and maintained by other carriers, no additional investment will be needed to offer the proposed service.
8. COMTECH 21, LLC plans to provide telecommunications services to subscribers to and from all points in the Commonwealth of Kentucky as now or may in the future be allowed by the Kentucky PSC's regulations for equal access, switched interexchange carriers. COMTECH 21, LLC intends to provide 24-hour intrastate long distance telephone service over facilities (usually virtual private networks) from other carriers. A copy of COMTECH 21, LLC proposed tariff is attached as Exhibit 4.
9. As a resale carrier, COMTECH 21, LLC will resell the transmission services of other carriers, the selection of which will be based upon COMTECH 21, LLC's analysis of facility cost, suitability and quality of service. COMTECH 21, LLC plans to provide telecommunications service strictly as a non-facilities based carrier and it has no plans to construct its own switching facilities at this time.
10. Applicant does not intend to require or hold customer deposits or to offer advance payment options. These and other subjects involved in its relationship with its Customers (billing responsibilities of the parties, liabilities, service termination, etc.) are covered in the attached proposed tariff. Applicant will comply with this tariff when approved as well as with all other orders and regulations of the Commission applicable to COMTECH 21, LLC

Wherefore, COMTECH 21, LLC requests that the Kentucky public Service Commission grant the requested Certificate of Public Convenience and Necessity to resell telecommunications services in Kentucky.

Respectfully submitted,



Marie Marcarelli
Manager

FILED

APR 18 2 46 PM '00

GUY R. ZEIGLER
O.F.C.C.

BY SPA D.C.

639
COMMONWEALTH OF KENTUCKY
JOHN Y. BROWN III
SECRETARY OF STATE



0493128.06

John Y. Brown III
Secretary of State

Received and Filed
04/18/2000 01:04 PM

APPLICATION FOR CERTIFICATE OF AUTHORITY

Fee Receipt: \$90.00

Pursuant to the provisions of KRS Chapter 275, the undersigned hereby applies for authority to transact business in Kentucky on behalf of the limited liability company named below and for that purpose submits the following statements:

1. The company is a limited liability company (LLC). dday - L902
 a professional limited liability company (PLLC).

2. The name of the limited liability company is
COMTECH 21, LLC

3. The name of the limited liability company to be used in Kentucky is

(if "real name" is unavailable for use)

4. Delaware is the state or country of organization.

5. 02-22-2000 is the date of organization and, if the limited liability company has a specific date of dissolution, the latest date upon which the limited liability company is to dissolve is Perpetual.

6. The street address of the office required to be maintained in the state of formation or, if not so required, the principal office address is:
One Barnes Park South Wallingford, CT 06492

7. The names and usual business addresses of the current managers, if any, are as follows:
Richard Minervinc SR One Barnes Park South Wallingford, CT 06492
Marie Marcarelli One Barnes Park South Wallingford, CT 06492
Name Address
Name Address
(Attach a continuation, if necessary)

8. The street address of the registered office in Kentucky is
421 West Main Street Frankfort Kentucky 40601
Street City State Zip Code

and the name of the registered agent at that office is
Corporation Service Company d/b/a/ CSC-Lawyers Incorporating Service Company

9. This application will be effective upon filing, unless a delayed effective date and/or time is specified:

(Delayed effective date and/or time)

I certify that, as of the date of filing this application, the above-named limited liability company validly exists as a limited liability company under the laws of the jurisdiction of its formation.

Marie Marcarelli
Signature
Marie Marcarelli, Manager
Type or Print Name & Title

Date: April 13, 2000

Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, consent to serve as the registered agent on behalf of the limited liability company.
Type or print name of registered agent

Jennifer L. Oliver, Assistant Vice President
Signature of Registered Agent
Type or Print Name & Title

STATE OF KENTUCKY, COUNTY OF FRANKLIN, SS:
I, GUY R. ZEIGLER, CLERK OF SAID COUNTY, HEREBY CERTIFY
SLL-902 (299) THAT THE FOREGOING INSTRUMENT HAS BEEN DULY RECORDED
IN MY SAID OFFICE
48 PAGE 639
GUY R. ZEIGLER, CLERK BY SPA 4/18/00 DL

(See attached sheet for instructions)

EXHIBIT 2

**APPLICATION FOR
AUTHORIZATION TO OPERATE
AS A RESELLER OF INTEREXCHANGE
TELECOMMUNICATIONS SERVICE**

COMTECH 21, LLC

DIRECTORS AND OFFICERS

The directors and officers of the Company are as follows:

Name:

Richard Minervino, Sr.
Manager

Marie Marcarelli
Manager

Sonja Johnson-Byers
Director

EXHIBIT 3

**APPLICATION FOR
AUTHORIZATION TO OPERATE
AS A RESELLER OF INTEREXCHANGE
TELECOMMUNICATIONS SERVICE**

COMTECH 21, LLC

MANAGEMENT EXPERIENCE

PRINCIPAL OFFICERS OF COMTECH 21, LLC

**PRESIDENT/CEO/CHAIRMAN OF BOARD OF DIRECTORS: RICHARD
MINERVINO, SR.**

Mr. Richard Minervino, SR currently serves as President, CEO and Chairman of the Board of Directors of COMTECH 21, LLC. Mr. Minervino has formed several companies in which from 1977 through 1992 have under Mr. Minervino's directions developed a series of sophisticated telecommunications monitoring, network design and cost reduction packages and have also engaged in the resale of their telecommunications services including cellular and long distance billing.

From 1964 to 1979, Mr. Minervino was President of Communications Management Services Corporation and served as a communications consultant. In both of these capacities, he concentrated on developing devices and systems for cost control and reduction to communications expenses.

From 1952 to 1964, Mr. Minervino served with the Southern New England Telephone Company in various technical and sales/marketing positions.

VICE PRESIDENT/SECRETARY/DIRECTOR: MARIE MARCARELLI

Ms. Marcarelli currently serves as Vice President and Secretary of COMTECH 21, LLC. In said position she has responsibility for establishing methods and procedures for all products and services, as well as developing, administering and negotiating client contract. She is also responsible for field operating methods, procedures and manuals, production and updating of the Companies plans, serves as an assistant to the president and has supervisory responsibilities for matters regarding utility inter-and intra-state regulatory procedures.

From 1988 through 1989, she served Mr. Minervino's other companies as director of administration. Ms. Marcarelli was employed from 1972 to 1987 by Southern New England Telephone and SNET Systems.

Ms. Marcarelli attended Albertus Magnus College and is currently attending Central Connecticut State University where she is studying for her Bachelor of Science Degree in business and economics.

DIRECTOR OF ADMINISTRATION: SONJA JOHNSON - BYERS

Ms. Johnson-Byers currently serves as Director of Administration for COMTECH 21, LLC. In said position, she has responsibility dealing with Provisioning, Customer Care and Revenue and Assurance and day to day administration duties.

Ms. Johnson – Byers worked for SNET for twenty (20) years and has kept in the telecommunications for twenty-six (26) years.

EXHIBIT 4

**APPLICATION FOR
AUTHORIZATION TO OPERATE
AS A RESELLER OF INTEREXCHANGE
TELECOMMUNICATIONS SERVICE**

COMTECH 21, LLC

PROPOSED TARIFF