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080137

March 5, 2008

COMMISSION
CLERK

VIA FEDERAL EXPRESS

Blanca S. Bayo
Division of the Commission Clerk and Administrative
Services Florida Public Service Commission
8540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**RE: Docket No. DN01503-08; Amendment to Startec Global Operating Company
and Americatel Corporation Notice of a *Pro Forma* Reorganization**

Dear Ms. Bayo:

Startec Global Operating Company ("Startec") and Americatel Corporation ("Americatel") (collectively, the "Companies"), by their attorneys pursuant to the rules of the Florida Public Service Commission (the "Commission"), hereby amend their notice to include a request that the Commission grant a waiver of its rules governing the changes to a customer's telecommunications provider, as set forth in Rule 25-4.118 of the Florida Administrative Code ("Slamming Rules"). The Companies filed the original notice advising the Commission of *pro forma* corporate reorganization involving the merger of the Companies, with Americatel surviving (the "Transaction") with the Commission on February 28, 2008, in the above referenced docket.

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I. REQUEST FOR WAIVER OF SLAMMING RULES

In addition to the cancellation of Startec's operating authority, the Companies request that the Commission grant a waiver of the Commission's Slamming Rules, Rule 25-4.118(1), (2), (3) -(6), (9), and (11) of the Florida Administrative Code, to the extent those rules are inconsistent with the FCC's streamlined rules governing the sale of a carrier's customer base, 47 C.F.R. § 64.1120(e). Pursuant to Rule 25-4.118(1), Florida Administrative Code, the long distance provider of a customer shall not be changed without the customer's authorization. Rule 25-4-118(2) provides that a certified interexchange carrier shall submit a change request only if at least one of the following actions has occurred: (a) the provider has a letter of agency; (b) the provider has received a customer-initiated call; or (c) a third party firm has verified the customer's requested change. Rules 25-4.118(3)-(6), (9), and (11) set forth the procedures for obtaining such customer authorization. The Parties ask the Commission to waive the conditions in 25-4.118(1), (2), (3) - (6), (9), and (11) in order to allow the transfer of customers of record in connection with the transaction.

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The Companies already have complied with the Federal Communications Commission's ("FCC") notice requirements applicable to transfers of carrier customer bases. This FCC rule ensures that all affected subscribers receive advance notice of the planned transfer and any potential impact (none in this case) on their telecommunications services. In addition, the Companies have complied with FCC rules requiring Americatel to certify to the FCC that it has provided at least 30 days' written notice to each customer affected by this transaction, under 47 C.F.R. § 64.1120(e)(1-3). A copy of the notice that has been sent to all affected Startec subscribers in Florida is attached hereto.

A waiver of inconsistent or additional Slamming Rules in this context will serve the public interest because a waiver would prevent duplicative expenses that would result in increased costs for the Companies and ultimately could be transferred to customers in the form of higher prices. In addition, compliance with Florida's Slamming Rules in the context of this Transaction is not necessary to achieve the purpose of those rules and to ensure that all customers receive ample actual notice of the transaction, because each and every customer has already received the notice prescribed under the FCC's rules. Further, following the Transaction, Americatel intends to provide Startec's former customers with quality telecommunications services, without interruption or change to the rates, terms, and conditions applicable to the services they receive resulting from the acquisition. Finally, if the Companies are unable to achieve compliance with the Commission requirements governing changes in telecommunications providers prior to closing, individual customers could be at risk for interruption to their telecommunications services.

II. ADDITIONAL INFORMATION REGARDING CUSTOMER COUNTS AND COMPLAINTS

In addition, the Companies provide the following information requested by the Commission. As of January 31, 2008, Startec serves approximately 6,263 presubscribed long distance customers in Florida. In addition, Startec serves approximately 11,607 casual "dial around" customers that use a code to access Startec interexchange services and approximately 1,629 cell connect customers in Florida.

Startec customers may continue to use the existing customer service numbers for customer complaints both before and after the merger. Startec will address any complaints filed prior to the merger. After the merger, Americatel will handle any complaints filed by customers served under the Startec brand name, including any complaints involving issues prior to the merger and any pending Startec complaints.

III. CONCLUSION

This letter amends the original notification filed with the Commission on February 28, 2008 (i) advising the Commission of a transaction for which no approval is required in Florida, and (ii) requesting that the Commission cancel Startec's operating authority in Florida upon consummation of the Transaction, scheduled to occur on or about March 31, 2008, or as soon as practicable after receipt of all necessary regulatory approvals. In this amendment, the

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Companies hereby request that the Commission waive the requirements in its Slamming Rules as set forth in Rule 25-4.118(1), (2), (3) - (6), (9), and (11) of the Florida Administrative Code. The Companies respectfully request *expedited* processing of this request, to the extent necessary.

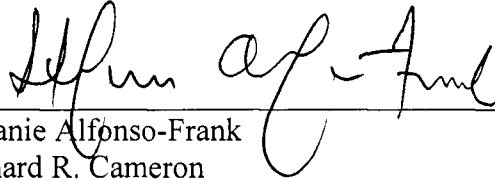
An original and two (2) copies of this letter, along with one (1) further copy for date-stamp and return are enclosed. Please date-stamp the extra copy of this letter and return it in the self-addressed, stamped envelope provided for that purpose. Questions regarding this letter may be directed to the undersigned.

RESPECTFULLY SUBMITTED THIS 5th day of March, 2008.

Respectfully submitted,

AMERICATEL CORPORATION
STARTEC GLOBAL OPERATING COMPANY

By Their Counsel:



Stefanie Alfonso-Frank
Richard R. Cameron
Latham & Watkins LLP
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004
(202) 637-2200



Thomas H. Perez-Ducy
President and Chief Executive Officer

Startec Global Operating Company
477 Peace Portal Dr., #107
Blaine, WA 98230

A Notice from Startec Global Operating Company and Americatel Corporation About Your Long Distance Telephone Service

Dear Valued Customer:

Startec Global Operating Company ("Startec") and Americatel Corporation ("Americatel") are pleased to announce that Startec and Americatel are merging their businesses. As a result of the merger, Americatel will now provide your long distance service using the same great Startec name you know and trust. The anticipated date for the merger of Startec into Americatel is March 31, 2008, or as soon thereafter as Startec and Americatel obtain the necessary regulatory approvals.

To retain your current service, you need do nothing. There will be no cost to you because Americatel will be responsible for any carrier change charges resulting from the merger, nor will the merger change your current calling plan or your rates, service features or terms and conditions. You will simply continue to receive the same services and rates that you enjoy today under your Startec plan. Additionally, although no change in your service is contemplated, you will be notified of any future changes to the rates, terms and conditions of your service in same manner as you always have – in your bill, by mail, or through other lawful means.

If you have placed a preferred carrier freeze on your account, the freeze will remain in place following the merger. We are required by law to inform you that you have the right to select a different preferred long distance carrier, if one is available. If you choose to change to a different preferred long distance carrier, you may first need to lift any freeze you may have placed on your account by calling your local telephone company.

As always, for help with any customer service, billing issue or complaint, we will continue to assist you at our Customer Service toll-free number 1.800.827.3374, before, during and after the merger.

Sincerely,

Thomas H. Perez-Ducy
President and Chief Executive Officer
Americatel Corp. Startec Global Communications

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