

November 24, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: Comments of the Minnesota Department of Commerce
In the Matter of the Revocation of Silv Communications, Inc.'s Certificate of Authority,
Docket No. P6541/RV-21-771**

Dear Mr. Seuffert:

The Department of Commerce (Department) has reviewed and analyzed the current filing. Attached is the Department's checklist for processing revocation dockets. The checklist reflects the Department's analysis of the issues relating to the requirements of Minnesota law and the Commission's rules to support the revocation.

Silv Communications, Inc. (Carrier) originally received certification to provide long-distance service in Docket No. P6541/NA-06-415.

The docket was opened on: November 2, 2021

The carrier's last known addresses:

3460 Wilshire Blvd, Unit 1103
Los Angeles, CA 90010

3435 Wilshire Blvd, Suite 2605
Los Angeles, CA 90010

Minnesota Statutes §237.16, subd. 5 states in part, "any certificate of authority may, after notice of hearing and a hearing, be revoked or temporarily suspended, in whole or in part, for: ...failure to meet the terms and conditions of its certificate..."

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Recommended Action: Revocation of Silv Communications Inc.'s Certificate of Authority

Conditions of Revocation: None

Conditions that apply to *actions to be taken:* None

The Department intends to petition the Commission to require that all carriers discontinue their services to the carrier pursuant to Minn. Stat. 237.121 (a) (6). For administrative efficiency, this petition will be filed at a future time with other carriers that have recently relinquished their authority or have recently had their authority revoked. A separate docket number will be assigned to that petition. Affected carriers should be placed on inactive status on the Commission's Master Contact List pending final discontinuance.

Sincerely,

/s/ DIANE J. DIETZ
Rate Analyst

DD/ar
Attachment

**CHECKLIST FOR PROCESSING STANDARD REVOCATIONS OF
CERTIFICATES OF AUTHORITY**

I. TYPE OF CERTIFICATION

- A. Local Exchange Certificate of Authority (Docket No. _____)
- B. Long Distance Certificate of Authority (Docket No. P6541/NA-06-415)
- C. Local Niche Certificate of Authority (Docket No. _____)

II. REVOCATION PROCESSES THAT APPLY ALL CERTIFICATES

- A. Carrier's last known address is no longer valid. Yes
- B. Carrier's last known telephone numbers are no longer in service. There was no response to voice mail message left at Carrier's toll-free number. Local phone number for Company President does not appear to be operational.
- C. Carrier cannot be reached electronically (electronic mail or internet). The Department received no response to email message sent to Company President and staff responsible for filing annual reports.
- D. Carrier filed its last annual report in (year) 2020.
- E. The Minnesota Secretary of State's records show that the carrier no longer holds a certificate to do business in Minnesota. There is no record of this carrier with Minnesota Secretary of State.
- F. The Commission's Consumer Affairs Office (CAO) complaint records do not indicate that the carrier continues to provide service in Minnesota. Yes.
- G. Any assessments or fees unpaid to the Department, Commission, Metropolitan 911 Board, or Department of Public Safety remain the responsibility of the carrier. Carrier does not have certification to provide local service, so carrier does not have unpaid fees owed to the Metropolitan 911 Board or the Minnesota Department of Public Safety. There are no unpaid assessments owed to the Minnesota Department of Commerce. The Minnesota Department of Commerce recently wrote off assessments owed by the carrier in the amount of \$14.63.
- Company is current with filing annual reports. Yes

Intrastate jurisdictional revenue would be needed to enable assessment for the following past years: _____

Annual reports for past years should be pursued:
 Yes No

Intrastate jurisdictional revenue will need to be filed by May 1 of the following year if company had intrastate revenues in current year, and regulatory assessment should be pursued:
 Yes No

- H. The docket history of this company has been checked to verify that the authority of the company has not been addressed within an acquisition docket. If the revocation was addressed within an acquisition docket, a separate revocation docket may not be required. Yes No No acquisition docket was filed.
- I. DOC analyst must electronically file a submission, to be included in the on-line tariffs, stating that the company is no longer operating in Minnesota.
- J. Other: Note that Silv Communications filed a letter with the Oregon PUC on December 31, 2020 stating "Silv Communications, Inc. . . . will be closing permanently at the end of January 2021 due to the present circumstances that our nation is facing with this pandemic."

III. REVOCATION PROCESSES THAT APPLY ONLY TO LOCAL CERTIFICATES

- NA A. The carrier's 911 plan, filed in Docket No. _____, should be cancelled. If the carrier has filed a 911 plan and has operational or conditional authority to provide local services, the Minnesota Department of Public Safety, and, if applicable, the Metropolitan 911 Board, will be notified of this recommendation by being placed on the service list for this docket. _____
- NA B. Any Incumbent Local Exchange Carriers (ILECs) that have interconnection agreements with the carrier should be notified that the carrier no longer has authority to provide telecommunications services in Minnesota and services should no longer be offered under its interconnection agreement(s). The parties to those interconnection agreements have been notified of this recommendation by being placed on the service list in this docket. The carrier's interconnection agreement(s) were approved in Docket Nos. _____.
- NA C. If the carrier has either filed a 911 plan or has been an operational provider of local services, the 911 system integrator, if known, will be notified of the revocation of the carrier's certificate of authority by being placed on the service list for this docket. Qwest is the 911 system integrator for the metropolitan area. _____

NA D. For facilities-based carriers, the North American Numbering Plan Administrator (NANPA) should be notified of the relinquishment of the carrier's certificate of authority so that any NXX blocks assigned to the carrier may be returned to NANPA. _____

NANPA has been added to the service list for this docket. _____

NANPA has not been added to the service list for this docket. Explain: _____

Carrier did not have facilities-based authority. _____

NA E. For competitive local exchange carriers, the Universal Service Administrative Company (USAC) has been notified of the revocation, so they can discontinue paying funds to the affected carrier. _____

USAC has been added to the service list for this docket.¹ _____

NA G. USAC has not been added to the service list for this docket. Explain: _____

F. Other issues (specify): _____

IV. RECOMMENDATION OF THE DEPARTMENT

A. Revoke the carrier's authority. _____

B. Revoke the carrier's authority subject to the following: (RESTATE ALL ACTIONS THAT ARE TO BE TAKEN): _____

¹ When handling relinquishments or revocation dockets, the Department analyst should check to see whether the affected carrier is on the list of high-cost low income companies by going to www.usac.org and clicking the blue tab entitled "high cost." Next click on "disbursement data search" under "high-cost tools" in the left-hand column and type "MN" into the box marked "State." The address of this page is <http://www.usac.org/hc/tools/disbursements/default.aspx>. Check the list of low-income companies for all names that the affected carrier has ever used. If the affected carrier is on the USAC list, then send the Department comments to Karen at USAC. Otherwise, send the Department comments to Legal at USAC.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Checklist - Comments**

Docket No. P6541/RV-21-771

Dated this 24th day of November 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sk. Golam	Ahia	silvcomm@yahoo.com	Silv Communications Inc	3435 Wilshire Blvd., Ste 2605 Los Angeles, CA 90010	Electronic Service	No	OFF_SL_21-771_RV-21-771
John	Auerbach	jauerbach@somos.com	NANPA/Somos, Inc.	1800 Sutter St Ste 780 Concord, CA 94502	Electronic Service	No	OFF_SL_21-771_RV-21-771
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-771_RV-21-771
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-771_RV-21-771
David	Denton	david.denton@state.mn.us	DPS ECN	445 Minnesota Street Suite 137 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_21-771_RV-21-771
Pete	Eggimann	PEGGIMANN@MN-MESB.ORG	Metropolitan Emergency Services Board	2099 University Ave W Ste 201 St. Paul, MN 551043431	Electronic Service	No	OFF_SL_21-771_RV-21-771
Michelle	Garber	mgarber@usac.org	USAC - Universal Service Administrative Company	2000 L St NW Ste 200 Washington, DC 20036	Electronic Service	No	OFF_SL_21-771_RV-21-771
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-771_RV-21-771
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-771_RV-21-771
Beth	Sprague	bsprague@somos.com	NANPA/Somos, Inc.	2411 Dulles Corner Park Ste 250 Herndon, VA 20171	Electronic Service	No	OFF_SL_21-771_RV-21-771

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dana	Wahlberg	dana.wahlberg@state.mn.us	Department of Public Safety	Town Square Ste 137 444 Cedar St St. Paul, MN 551015126	Electronic Service	No	OFF_SL_21-771_RV-21-771
Maria	Zepeda	silvzepeda@yahoo.com	SILV Communication Inc.	Suite 1103 3460 Wilshire Blvd. Los Angeles, CA 90010	Electronic Service	No	OFF_SL_21-771_RV-21-771