

# STEVENS & LEE

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Wilmington, DE 19801  
www.stevenslee.com

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2014 APR 25 AM 11 55

DELAWARE P.S.C.

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Email: jhh@stevenslee.com  
Direct Fax: (610) 371-7972

April 24, 2014

**BY FEDERAL EXPRESS**

Alisa Carrow Bentley, Secretary  
Delaware Public Service Commission  
861 Silver Lake Boulevard  
Cannon Building, Suite 100  
Dover, DE 19904

**RE: Joint Application of Business Discount Plan, Inc. and Consumer Telcom, Inc. for  
Approval to Assign Customer Contracts**

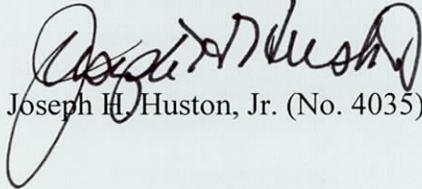
**PSC Docket No. 14-114**

Dear Ms. Bentley:

Enclosed for filing with the Commission are an original plus ten (10) copies of a Supplement to the above-referenced Application.

Please date-stamp the extra copies of this filing and return it to me in the enclosed self-addressed stamped envelope. If you have any questions, please contact me by any of the means listed above. Thank you.

STEVENS & LEE

  
Joseph H. Huston, Jr. (No. 4035)

Enclosures  
cc: Certificate of Service

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harrisburg • Lancaster • Scranton  
Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

A PROFESSIONAL CORPORATION



BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE

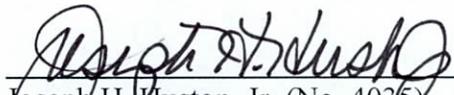
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IN THE MATTER OF THE JOINT APPLICATION )  
OF BUSINESS DISCOUNT PLAN, INC. AND ) DELAWARE P.S.C.  
CONSUMER TELCOM, INC. FOR APPROVAL TO ) PSC DOCKET NO. 14-114  
ACQUIRE DELAWARE CUSTOMERS AND )  
CONTRACTS (FILED MARCH 19, 2014) )

Amendment to Application

Business Discount Plan, Inc. ("BDP") hereby files this Amendment to the March 19, 2014 Application requesting approval for BDP to acquire the Delaware customers of Consumer Telcom, including customer contracts, through a mutually negotiated customer base acquisition (the "Transaction"). This Amendment shall confirm that the Applicants hereby withdraw the request to waive any applicable account transfer or "anti-slamming" requirements under Delaware and Federal statutes and regulations.

Respectfully submitted,

  
\_\_\_\_\_  
Joseph H. Huston, Jr. (No. 4036)  
STEVENS & LEE, P.C.  
1105 North Market Street, Suite 700  
Wilmington, DE 19801  
Telephone: 302.425.3310  
Email: jhh@stevenslee.com

Dated April 24, 2014

ORIGINAL

Handwritten signature or scribble

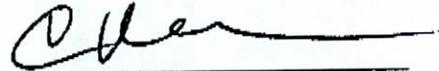
STATE OF CALIFORNIA

)  
)  
)

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 Amendment to the Joint Application of Business Discount Plan, Inc. and Consumer Telcom, Inc. for Approval to Assign Customer Contracts was prepared under my direction and supervision; and that, with respect to BDP, the statements made in the Amendment are true and correct to the best of my knowledge information and belief.



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

Sworn to and Subscribed to me this 22<sup>nd</sup> day of April, 2014

Surbhi Lohia

Notary Public

SEAL



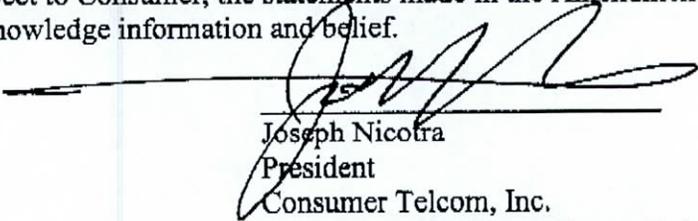


STATE OF CALIFORNIA )

COUNTY OF ORANGE )

**VERIFICATION**

I, Joseph Nicotra, state that I am President of Consumer Telecom, Inc. ("Consumer"); that I am authorized to make this verification on behalf of Consumer; that the foregoing Amendment to the Joint Application of Business Discount Plan, Inc. and Consumer Telecom, Inc. for Approval to Assign Customer Contracts was prepared under my direction and supervision; and that, with respect to Consumer, the statements made in the Amendment are true and correct to the best of my knowledge information and belief.



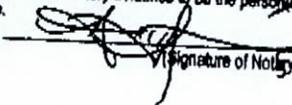
Joseph Nicotra  
President  
Consumer Telcom, Inc.  
701 N. Green Valley Parkway, Suite 200  
Henderson, NV 89014

Sworn to and Subscribed to me this 23<sup>rd</sup> day of APRIL, 2014

  
Notary Public

SEAL



STATE OF CALIFORNIA COUNTY OF ORANGE  
Subscribed and sworn to (or affirmed) before me on this  
23<sup>rd</sup> day of APRIL, 2014 by JOSEPH NICOTRA  
proved to me on the basis of satisfactory evidence to be the person  
who appeared before me.   
(Signature of Notary)



**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF DELAWARE**

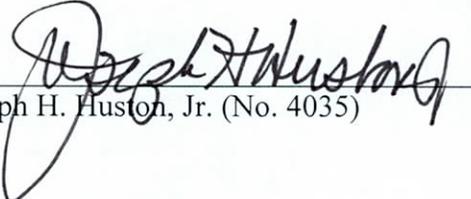
IN THE MATTER OF THE JOINT APPLICATION            )  
OF BUSINESS DISCOUNT PLAN, INC. AND            )  
CONSUMER TELCOM, INC. FOR APPROVAL TO        ) PSC DOCKET NO. 14-114  
ACQUIRE DELAWARE CUSTOMERS AND            )  
CONTRACTS (FILED MARCH 19, 2014)            )

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of April, 2104 a copy of the foregoing Amendment to Application was served by first class mail, postage prepaid, upon the following:

Division of the Public Advocate  
820 N. French St., 4th Floor  
Wilmington, Delaware 19801

Julie M. Donoghue, Esquire  
Deputy Attorney General  
Delaware Department of Justice  
820 North French Street, 6th Floor  
Wilmington, DE 19801

  
\_\_\_\_\_  
Joseph H. Huston, Jr. (No. 4035)

Handwritten signature or scribble.