



STATE OF DELAWARE  
**THE PUBLIC SERVICE COMMISSION**  
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September 16, 2014

**MEMORANDUM**

**TO:** The Chair and Members of the Commission

**FROM:** Kevin Neilson, Regulatory Policy Administrator

**SUBJECT:** IN THE MATTER OF THE APPLICATION OF VODAFONE US INC.  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY TO PROVIDE COMPETITIVE LOCAL EXCHANGE  
AND EXCHANGE ACCESS TELECOMMUNICATIONS SERVICES  
WITHIN THE STATE OF DELAWARE (FILED MAY 19, 2014) - PSC  
DOCKET NO. 14-179

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Vodafone US Inc. (“Vodafone”), has applied (“Application”) for a Certificate of Public Convenience and Necessity (“CPCN”) to provide competitive local exchange and exchange access telecommunications services within the State of Delaware. The Delaware Public Service Commission staff (“Staff”) has reviewed the Application to determine its compliance with the Rules and Regulations promulgated in 26 *Del. Admin. C.* §4001. Vodafone was granted a CPCN for intrastate long distance service from the Delaware Public Service Commission (“Commission”) on February 20, 2014, in PSC Docket No. 13-388 (Order No. 8531) under the name Vodafone Global Enterprise Inc. (“VGEI”).<sup>1</sup>

On January 8, 2014, VGEI submitted an irrevocable stand-by Letter of Credit in the amount of \$10,000 issued by Bank of America on behalf of VGEI in compliance with 26 *Del. Admin. C.* §§4001-4.6.1 and 4.6.3. To demonstrate its financial capability, Vodafone also provided to Staff its verified financial report for the fiscal period ended March 31, 2014.

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<sup>1</sup> Vodafone changed its name in 2014 and filed a tariff change request reflecting the name change with the Commission concurrently with this Application (PSC Docket No. 14-180). In accordance with 26 *Del. Admin. C.* §4001-5.2, telecommunication carriers, such as Vodafone, may revise its existing tariff with three days’ prior notice to the Commission. Vodafone filed the tariff change on May 19, 2014, with an effective date of May 30, 2014.

To demonstrate its technical and operational capabilities, Vodafone provided Staff with background information of its principal officers and employees. In addition, Vodafone states it is currently certified to provide long distance services in 14 states, including Delaware, and local exchange services in four states.

Pursuant to 26 *Del. Admin. C.* §4001-4.3, a copy of the Application was provided to the Division of the Public Advocate, and public notice of the Application was published in The News Journal and in the Delaware State News newspapers on June 10, 2014. Staff reports that it received no formal comments or objections to Vodafone's Application for a CPCN.

As part of its Application, Vodafone requested a waiver of the provisions of 26 *Del. C.* §208(b) so that it may maintain its books and records relating to its Delaware operations outside of the State of Delaware. In addition, Vodafone requested a waiver of the provisions of 26 *Del. Admin. C.* §4001-10.2 so that it may maintain its books consistent with International Financial Reporting Standards, an internationally accepted accounting system. Staff believes that the waiver requests are reasonable and recommends that the Commission grant the requested waivers.

Based on Staff's review and analysis, Vodafone has shown that it has the financial, operational, and technical means to provide local telecommunications services in Delaware. Therefore, Staff recommends that the Commission grant Vodafone US Inc. a CPCN to provide competitive local exchange and exchange access telecommunications services within the State of Delaware.