



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

October 11, 2018
Via Overnight Delivery

Ms. Sara J. Clark, Secretary, Commission Secretary
MA Department of Telecommunications & Cable
1000 Washington Street
Suite 820
Boston, MA 02118

RE: Motion of Legacy Long Distance International, Inc. For Reconsideration of Docket No. D.T.C. 1-AR-3 and Motion to Submit a Late Filing of Motion to Reconsider

Dear Ms. Clark:

Enclosed for filing please find the original and one (1) copy of the Motion for Reconsideration and Motion to Submit a Late Filing of Motion to Reconsider submitted on behalf of Legacy Long Distance International, Inc. in the above-referenced docket number.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

Sharon R. Warren
Consultant

cc: Rafael Quinto (Via Email) - Legacy
MA - Department of Telecommunications and Cable - (Via Email)
tms: MAx1803

Enclosures
SW/mp

BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

In the Matter of	)	
Legacy Long Distance International, Inc.	)	DTC 13-AR-3
For Calendar Year 2011	)	

MOTION OF LEGACY LONG DISTANCE INTERNATIONAL, INC. TO SUBMIT A
LATE FILING OF MOTION TO RECONSIDER

Comes now, Legacy Long Distance International, Inc. ("Legacy") and files this Motion to Submit a Late Filing of its Motion to Reconsider the final order in Docket No. D.T.C. 13-AR-3. Legacy's Motion to Reconsider attached hereto as Exhibit "A". In support of this motion, Legacy provides the following:

I.

Legacy's failure to file its 2011 Annual Report in a timely manner was inadvertent and it has since established an internal corporate process as well as hired Inteserra Consulting Group, Inc. ("Inteserra") to ensure ongoing compliance with regulatory reporting obligations.

II.

Legacy has filed the 2011 Annual Report with the Department and has been compliant since it has hired Inteserra as its regulatory consultants.

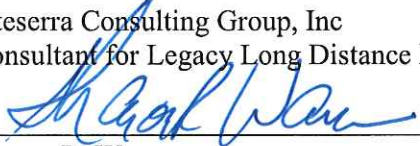
III.

Inteserra submitted Legacy's 2016 Annual Report on May 17, 2017 without consequence and was unaware that Legacy owed any penalties until Inteserra submitted Legacy's 2017 Annual Report on May 20, 2018. At that time, Legacy was listed as one of the DTC's regulated telecommunications companies posted on its website.

WHEREFORE, Legacy Long Distance International, Inc prays that its Motion to Submit a Late Filing of a Motion for Reconsideration be granted.

This 11th day of October, 2018

Inteserra Consulting Group, Inc
Consultant for Legacy Long Distance International, Inc.



Sharon R. Warren

Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
(407) 740-3005 telephone
(407) 740-0613 facsimile

Legacy Long Distance International, Inc.
DTC 13-AR-3
Exhibit A

Motion For Reconsideration

BEFORE THE
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

In the Matter of	)	
Legacy Long Distance International, Inc.	)	DTC 13-AR-3
For Calendar Year 2011	)	

**MOTION OF LEGACY LONG DISTANCE INTERNATIONAL, INC. FOR
RECONSIDERATION OF DOCKET NO. D.T.C. 13-AR-3**

Legacy Long Distance International, Inc. ("Legacy") respectfully petitions for reconsideration of the Commonwealth of Massachusetts Department of Telecommunications and Cable ("Department") Docket No. D.T.C. 13-AR-3, which orders Legacy to pay the Department statutory forfeitures as outlined in the final order and the subsequent revocation of its authority in the state of Massachusetts. For the reasons set forth below, Legacy requests that the Order be reconsidered, rescinded and otherwise set aside.

SUMMARY

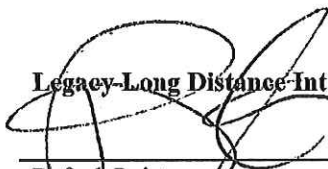
The Department's standard for reconsideration is well settled. The Department grants reconsideration of previously decided issues only when extraordinary circumstances dictate that the Department take a fresh look at the record for the express purpose of substantively modifying a decision reached after review and deliberation¹. Legacy Long Distance International, Inc. is a registered carrier with an SBO and an approved tariff on file with the Department. Therefore, Legacy must file an annual return with the Department every year that it is registered, pursuant to G.L.c159, §11 but failed to do so for 2011. Legacy's failure to file timely was inadvertent and has since established an internal corporate process to ensure ongoing compliance. Legacy also hired Inteserra Consulting Group, Inc. f/k/a Technologies Management ("Inteserra") a leading consulting firm for the communications and competitive energy industries, with over 30 years of experience. After Inteserra began handling Legacy's reporting

¹ *Verizon Resale Tariff*, D.T.C. 06-61, Order on Reconsideration, at 5-6 (2012); *Western Mass. Elec. Co.*, D.T.E. 00-110-C, at 9 (2001); *Fitchburg Gas & Elec. Light Co.*, D.T.E. 98-51-A, at 5-6 (1999) ("*Fitchburg*"); *North Attleboro Gas Co.*, D.P.U. 94-130-B, at 2 (1995); *Comm. Elec. Co.*, D.P.U. 92-3C-1A, at 3-6 (1995); *Boston Edison Co.*, D.P.U. 90-270-A, at 3 (1991).

requirements in all states where it has certification, Inteserra submitted Legacy's 2016 Massachusetts Annual Return on May 17, 2017 and received a stamped copy of the cover letter. At this time Legacy was listed as a regulated carrier on the Department's website. Inteserra again submitted Legacy's 2017 Annual Report on May 20, 2018. As soon as Legacy's current regulatory contact and Inteserra were made aware of the order in Docket No. D.T.C. 13-AR-3, the 2011 Annual Return was filed with the Department and contact was made with staff to comply with the order. Legacy assures the Department it will file its Annual Reports on time as it has done for the past two years since hiring Inteserra as its consulting firm.

CONCLUSION

Legacy Long Distance International, Inc. respectfully petitions for reconsideration of the Commonwealth of Massachusetts Department of Telecommunications and Cable's Docket No. D.T.C. 13-AR-3, which orders Legacy to pay the Department statutory forfeitures as outlined in the final order and the subsequent revocation of its authority in the state of Massachusetts and requests that the Order be reconsidered, rescinded and otherwise set aside.


Legacy-Long Distance International, Inc.

Rafael Quinto
Vice President Operations
10833 Valley View Street, Suite 150
Cypress, CA 90630
Telephone: (800) 577-5534
Facsimile: (800) 700-1116
Email: rquinto@legacyinmate.com