

NOWALSKY, BRONSTON & GOTHARD

A Professional Limited Liability Company

Attorneys at Law

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Monica Borne Haab
Philip R. Adams, Jr.

February 19, 2007

Via Overnight Mail

Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

2007 FEB 19 4:10 PM
Tennessee Regulatory Authority
Nashville, TN

RE: Application of Telecom Management, Inc. d/b/a Pioneer Telephone
For Authority to Provide Resold Local Exchange Service in Tennessee
Docket No. 07-00036

Dear Sir or Madam:

Enclosed please find an original and thirteen (13) copies of the responses to Staff's data request dated February 7, 2007. The responses are set forth as follows:

DR1: A copy of Telecom Management, Inc. d/b/a Pioneer Telephone's certificate of authority from the Secretary of State in Tennessee. Exhibit A contained only the application to the Secretary of State, not the actual certificate to transact business in Tennessee.

Response: Please find attached as Exhibit A.

DR2: Provide the name, business address and a chronological summary of the employment history and business experience of each principal officer of the company and any other person in a position to exercise control over or direction of the company. Detail all specific managerial and technical experience of each position.

Response: Please find attached as Exhibit B.

DR3: Describe the corporate structure of the applicant, including the identity of any parent or subsidiary of the applicant.

Response: The applicant is a corporation formed under the laws of the State of Maine, and

has no parent nor subsidiary.

DR4: Provide a certificate of good standing from the state in which the applicant was incorporated.

Response: Please find attached as Exhibit C.

DR5: Provide a list of complaints filed against applicant in any state in which it is doing business or filed with any federal agency. Identify the nature of the complaint and how the complaint was resolved.

Response: Please find attached as Exhibit D.

DR6: Is Telecom Management, Inc. d/b/a Pioneer aware of the local calling areas in your proposed service area? Describe the method that will be used to insure that customers are not billed toll charges for a call made to any other resident/business within the same county.

Response: Yes. Pioneer is aware of the local calling areas from their long distance operations in Tennessee since 2004. Pioneer relies on its underlying carriers to delineate calls that are local and calls that incur toll charges. However, Pioneer utilizes its tax vendor's address database to make final determinations on questionable calls to ensure customers aren't billed toll charges for local calls.

DR7: Will Telecom Management, Inc. d/b/a Pioneer Telephone's customers have access to 911 and E911 emergency service, be included in white page directory listings, be provided directory assistance, have access to the Tennessee Relay Center, be provided free blocking for 900/976 calls, and be offered Lifeline and Link Up upon meeting qualifications.

Response: Yes.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Becky Heggelund". The signature is fluid and cursive, with the first name "Becky" and last name "Heggelund" clearly distinguishable.

Becky Heggelund

Enclosures

Exhibit “A”

Secretary of State
Division of Business Services
312 Eighth Avenue North
6th Floor, William R. Snodgrass Tower
Nashville, Tennessee 37243

DATE: 02/04/03
REQUEST NUMBER: 4718-1028
TELEPHONE CONTACT: (615) 741-2286
FILE DATE/TIME: 02/04/03 0829
EFFECTIVE DATE/TIME: 02/04/03 0829
CONTROL NUMBER: 0441124

TO:
TELECOM MANAGEMENT INC
27 GORHAM ROAD
SCARBOROUGH, ME 04074

RE:
TELECOM MANAGEMENT, INC.
APPLICATION FOR CERTIFICATE OF AUTHORITY -
FOR PROFIT

WELCOME TO THE STATE OF TENNESSEE. THE ATTACHED CERTIFICATE OF
AUTHORITY HAS BEEN FILED WITH AN EFFECTIVE DATE AS INDICATED ABOVE.

A CORPORATION ANNUAL REPORT MUST BE FILED WITH THE SECRETARY OF STATE
ON OR BEFORE THE FIRST DATE OF THE FOURTH MONTH FOLLOWING THE CLOSE OF THE
CORPORATION'S FISCAL YEAR. PLEASE PROVIDE THIS OFFICE WITH WRITTEN
NOTIFICATION OF THE CORPORATION'S FISCAL YEAR. THIS OFFICE WILL MAIL THE
REPORT DURING THE LAST MONTH OF SAID FISCAL YEAR TO THE CORPORATION AT THE
ADDRESS OF ITS PRINCIPAL OFFICE OR TO A MAILING ADDRESS PROVIDED TO THIS
OFFICE IN WRITING. FAILURE TO FILE THIS REPORT OR TO MAINTAIN A REGISTERED
AGENT AND OFFICE WILL SUBJECT THE CORPORATION TO ADMINISTRATIVE REVOCATION
OF ITS CERTIFICATE OF AUTHORITY.

WHEN CORRESPONDING WITH THIS OFFICE OR SUBMITTING DOCUMENTS FOR
FILING, PLEASE REFER TO THE CORPORATION CONTROL NUMBER GIVEN ABOVE.

FOR: APPLICATION FOR CERTIFICATE OF AUTHORITY -
FOR PROFIT

ON DATE: 02/04/03

FROM:
NOWALSKY-BRONSTON (METRAIRE, LA)
SUITE 1275
3900 W. CAUSEWAY
METAIRIE, LA 70002-0000

RECEIVED: FEES \$600.00 \$0.00
TOTAL PAYMENT RECEIVED: \$600.00

RECEIPT NUMBER: 00003206244
ACCOUNT NUMBER: 00193877



Riley C. Darnell

RILEY C. DARNELL
SECRETARY OF STATE

Exhibit “B”

Susan E. Bouchard
1050 Highland Ave.
South Portland, Me. 04106
207-799-8433
1-866-329-7830
sue@pioneertelephone.com
www.pioneertelephone.com

Objective

Expand the company.

Experience

Telecom Management, Inc. DBA/Pioneer Telephone 1996-Current *President/CFO*

- Day to day operations
- Human Resources
- Financial record keeping

Fleet Bank of Maine 1986-1995

*Branch
Manager*

- Lending
- Managed staff of 6-10 people
- Responsible for overall profit of the branch.
- Sales of new accounts and products

Education

1986 University of Southern Maine

1986

- Computer Science
- Business Courses

Westbrook High School

1983-1986

- Business
- College prep. courses

Additional Skills

- QuickBooks
- Excel, Word, PowerPoint

Awards/Affiliations

- Banking Certificate
- Top Sales Producer

References

Available on Request

KEVIN PHOTIADES

Summary of Qualifications:

- Legal professional with high-level corporate and regulatory experience
- Hands-on experience with negotiating and managing business partner contracts
- Direct responsibility for guiding companies and clients in compliance activities, including legal research, drafting of documents and representation before state agencies
- Serve as day-to-day contact for vendor relations and large corporate accounts

Professional Experience:

Compliance Specialist – Telecom Management, Inc. d/b/a Pioneer Telephone Portland, Maine

June 2004 – Present

Responsible for management of all legal, regulatory and compliance activities for telecommunications company. Draft and file telecommunications licensing documents for authorities to provide local and long distance telephone services. Draft and complete corporate reports and other ongoing compliance documents. Maintain vendor relations. Research and respond to customer complaints filed with state PUCs, BBB and FCC. Review company policies and operating procedures for compliance. Update company tariffs as necessary.

Regulatory / Compliance Manager – United Systems Access, Inc. d/b/a USA Telephone Kennebunk, Maine

September 2002 – June 2004

Responsible for management of all legal, regulatory and compliance activities for telecommunications company. Negotiate and manage contracts with telecommunications vendors such as Verizon and Global Crossing. Establish and maintain vendor relations. Draft and file company tariffs that identify rates, terms and conditions for telephone service. Monitor and participate in state public utility proceedings involving compliance issues and disputes. Research and respond to customer complaints filed with state PUCs, Attorney General's office and FCC. Assist in preparing RFPs for provision of telephone service. Research and draft company policies involving collections, billing, disconnection procedures and customer privacy issues.

Paralegal – Long, Burner, Parks & DeLargy, P.C. Austin, Texas

April 1997 – July 2002

Provided legal support for three attorneys in Administrative Law section of firm in various aspects of corporate, regulatory and compliance practice. Incorporated and organized corporations, limited liability companies, and limited partnerships. Performed due diligence and drafted documents for mergers, acquisitions, and contracts. Performed compliance activities for banks, insurance companies and agencies after mergers and acquisitions were complete. Drafted state and federal trademark applications. Assisted at administrative hearings and district court appearances. Guided clients and accomplished multi-state licensing of individual insurance agents and corporate agencies, banks and other entities.

Paralegal – Hall & Kleeman, P.L.L.C.

Austin, Texas

March 1996 – April 1997

Assisted three attorneys with corporate/environmental/family law practice. Drafted client correspondence, litigation and discovery documents. Performed research at Texas Natural Resource Conservation Commission on environmental issues. Researched and drafted memos on various legal issues. Interviewed clients as needed for family law proceedings and account set-up. Assisted in bookkeeping for the firm by creating and maintaining client account spreadsheets.

Education:

Graduate: Paralegal Certificate, December 1996
Texas State University, San Marcos, Texas

Undergraduate: B.A., History, December 1991
University of Texas at Austin, Austin, Texas

Honors / Recognition:

Primary Scholarship Winner, Alamo Area Paralegal Association, Fall 1996
Panel Member, Texas Legal Educators Seminar, August 1998

PAUL F. DRISCOLL

43 Richardson Street
Portland, ME 04103
(207)-774-1060

EDUCATION:

Juris Doctor, 1981, University of Maine School of Law, Portland, Maine. Comments Editor, *Maine Law Review*.

Bachelor of Arts, 1978, University of New Hampshire, Durham, New Hampshire. Majors: Political Science and Classics; Minor: Business Administration. Academic Awards: *Phi Beta Kappa* and *Pi Sigma Alpha*.

EMPLOYMENT:

Norman, Hanson & DeTroy, LLC, Portland, Maine from 1984 through the present. Member of the Firm since January 1, 1986. Practice Concentration: Corporate and Commercial Law. Selected on January 26, 2001 for inclusion in *Best Lawyers in America*.

Verrill & Dana, LLP, Portland, Maine from 1981 through 1984. Associate. Practice Concentration: Corporate and Commercial Law.

COMPUTER SKILLS:

Experienced with Microsoft Word and Dragon Natural Word Voice Activated Software.

INTERESTS:

Bird Hunting with English Setters, Boating and Flyfishing. Marathons Completed: Dublin, Ireland Marathon, Sugarloaf Marathon (twice), Casco Bay Marathon (twice) and Pine Tree Marathon. Irish History.

PERSONAL:

Married to Beth Dobson, Esq., Partner, Verrill & Dana, LLP; Father of Three Children, including a Son with Autism.

CIVIC AND CHARITABLE:

- Leaders Circle, United Way of Greater Portland.
- Former President and Chairman of the Board of Port Resources, a Maine non-profit providing residential and support services for developmentally-challenged adults and children, including persons with autism.
- Chairman, 1999 Capital Campaign for St. Joseph's Catholic Church, Portland, Maine.

Exhibit “C”

State of Maine



Department of the Secretary of State

I, the Secretary of State of Maine, certify that according to the provisions of the Constitution and Laws of the State of Maine, the Department of the Secretary of State is the legal custodian of the Great Seal of the State of Maine which is hereunto affixed and of the reports of organization, amendment and dissolution of corporations and annual reports filed by the same.

I further certify that TELECOM MANAGEMENT, INC., formerly PAYPHONE MANAGEMENT, INC. is a duly organized business corporation under the laws of the State of Maine and that the date of incorporation is February 22, 1995.

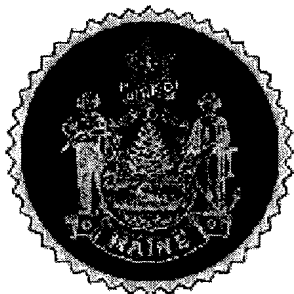
I further certify that on:

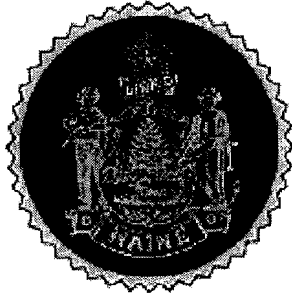
February 22, 1995	ARTICLES OF INCORPORATION were filed.
March 18, 1998	MERGER was filed.
December 10, 1998	CHANGE OF CLERK AND REGISTERED OFFICE was filed.
December 30, 1998	ASSUMED NAME was filed.
June 27, 2001	CHANGE OF LEGAL NAME was filed.
April 26, 2005	ASSUMED NAME was filed.

No further amendments have been filed to date.

I further certify that said business corporation has filed annual reports due to this Department, and that no action is now pending by or on behalf of the State of Maine to forfeit the charter and that according to the records in the Department of the Secretary of State, said corporation is a legally existing business corporation in good standing under the laws of the State of Maine at the present time.

In testimony whereof, I have caused the Great Seal of the State of Maine to be hereunto affixed. Given under my hand at Augusta, Maine, this thirteenth day of February 2007.





A handwritten signature in black ink, appearing to read "Matthew Dunlap", written in a cursive style.

MATTHEW DUNLAP
Secretary of State

Exhibit “D”

Customer Complaint Log - 2006

CustName	ST	Agency	ReferenceNo	DateofComp	DateRecvd	DateReslvd	Nature of Complaint / Resolution
L		FCC	05-W11212644	11/22/2005	12/14/2005	1/3/2006	cust upset over switch errors causing appearance of double-billing - issued credit
Sam	FL	PSC	675787T	11/10/2005	1/5/2006	1/5/2006	Adelphia cust did not get notice of acquisition
Marie	FL	PSC	682052T	12/27/2005	1/9/2006	1/10/2006	Cust wanted to add Pioneer for LD, reps gave her wrong PIC for interstate
Erica	NJ	BPU	06V0000384	1/9/2006	1/9/2006	1/10/2006	Cust switched to Pioneer for LD, but interstate calling was not switched for some reason
Roberta	WA	AG	246927	1/23/2006	2/17/2006	2/21/2006	switch problems in WA produced appearance of double billings, ghost numbers. Made two credits.
Tina	CA	PUC	06-00-8434	3/9/2006	3/30/2006	3/30/2006	complained about collection fees, disputed amount owed. Waived collection fees.
Charles	CA	PUC	06-00-1712	1/14/2006	3/20/2006	3/30/2006	Complained refund check was too slow - verified check was sent 2 days ago.
R K		FCC	06-S0223611	2/16/2006	3/17/2006	4/13/2006	cust never called to cancel before switching from Adelphia to Verizon. No adjustment.
John		FCC	06-S0229981	3/21/2006	4/12/2006	5/1/2006	cust received charge for change to Sprint, credited PIC charge
Richard		FCC	06-I0227814	3/13/2006	4/28/2006	5/2/2006	cust wanted additional credit for fax blast calls. Responded that no additional credit is due.
Edward	OH	PUC	ENOV050206NF	5/2/2006	5/2/2006	5/8/2006	complaint over late fees, said he didn't get bill (he didn't since he opted for online billing). Waived late fees.
Harry	OH	PUC	HBOL050506MR	5/5/2006	5/8/2006	5/9/2006	complaint over calls made to 800#, disputing \$5.64, call center rep gave credit, responded to PUC re: same
Byrd		FCC	05-S0211097	2/9/2006	6/12/2006	6/12/2006	Adelphia cust did not get notice of acquisition
Thomas	NY	PSC	616357	6/26/2006	6/26/2006	6/26/2006	complaint over call charges - D. Shorey handled - credited remaining balance and closed account
George		FCC	06-W11751771	5/6/2006	7/5/2006	7/6/2006	complaint over additional usage tacked on to calls. David O gave \$73 credit in March. Responded to FCC re: same
Donald	NE	PSC	06-4810	5/22/2006	7/7/2006	7/11/2006	mixup over switch to Global - Pioneer never billed, cust had no usage, just complained about problems switching
Mike		FCC	06-W11954022	6/27/2006	7/13/2006	7/14/2006	cust did not recognize calls on 6/21 bill. Responded that we verified all calls, except for ATL calls, which we credited.
Josie		FCC	06-W11723572	4/20/2006	7/17/2006	7/18/2006	cust blocked at 45 days past due, she thought she had more time, no fault of ours
L		FCC	05-W11274433	12/13/2005	7/24/2006	7/24/2006	Duplicate of complaint which was answered on 1/3/2006 (see above) and follow up on 2/21/2006
Larry	OH	PUC	LROS072406EE	7/27/2006	7/27/2006	7/27/2006	cust upset over late fees. Reversed late fees and gave \$4.93 credit.
Wendy	OH	PUC	WJEN08020678	8/3/2006	8/3/2006	8/3/2006	cust incurred late fees and January charges that she didn't pay. Wrote off late fees, but insisted she pay January bill
Ruth	VT	DPS	132830	7/20/2006	8/3/2006	8/3/2006	upset over disco notice. Her credit card was declined at the time, we processed new info. She is all set.
Jerome	OH	PUC	JDOM080206VL	8/2/2006	8/4/2006	8/4/2006	Adelphia cust did not get notice of acquisition.
Timothy	WV	PSC	RFA#4927	8/7/2006	8/7/2006	8/7/2006	cust received bill after cancellation in Dec., ANI wasn't cancelled in BW, wrote off balance
William		FCC	06-W11567035	3/9/2006	8/7/2006	8/8/2006	cust did not receive credit for "ghost" calls - credit entered after last statement - sending refund check
Robert	TX	PUC	CP2006080357	8/3/2006	8/4/2006	8/19/2006	AT&T refused to switch cust to Pioneer. Explained what happened to PUC. No bill, never a customer
Lynn	OH	PUC	LEBE080806TK	8/8/2006	8/9/2006	8/10/2006	wanted assistance from PUC with releasing her TFN. Would not release until we were paid, advised of that by CSR.
Larry	NH	PUC	LWL vPT	8/8/2006	8/10/2006	8/10/2006	Adelphia cust notified LEC instead of PT that he wanted to cancel. Small amount written off and acct. closed.
Joy		FCC	06-I0243327	7/17/2006	8/16/2006	8/17/2006	complained about level of detail on taxes, rep did not explain taxes to her. apologized and explained taxes
Dave		FCC	06-W12071177	8/2/2006	8/16/2006	8/17/2006	cust didn't call to cancel, received quarterly bill. Small balance, wrote off.
Jean	VA	SCC	none	8/21/2006	8/21/2006	8/21/2006	didn't understand how we bill in arrears, disputed final bill. Sent copies of bills to rep at SCC to show charges were legit
Dawn	OH	PUC	DSKO081806GY	8/22/2006	8/22/2006	8/22/2006	in collections, disputing bill. Charges are valid, she did not notify PT before she cancelled
Deborah	WV	AG	none	8/16/2006	8/22/2006	8/22/2006	transferred from Adelphia as active, she cancelled before 8/05. wrote off balance and closed account
Ken	VT	DPS	133132	8/25/2006	8/25/2006	8/28/2006	complained about rates and LUF. Already credited on 8/9. Rates haven't changed, gave one time credit.
Diane	PA	PUC	2133758	8/29/2006	8/29/2006	8/31/2006	charged LUF and low usage fees, did not contact us to cancel. Wrote off small balance.
Bruce		FCC	06-I0245570	8/7/2006	8/29/2006	8/31/2006	Adelphia cust did not want Pioneer for intrastate. Balance already written off and account closed in June.
Tom		FCC	06-W12071509	8/4/2006	9/12/2006	9/18/2006	Adelphia cust did not get notice of acquisition.
Pamela		FCC	06-W12043137	7/25/2006	9/11/2006	9/19/2006	had trouble switching from ATT, they disco'd before the switch was complete on our end, no fault of ours.
Kevin	KY	PSC	2006-02789	9/19/2006	9/19/2006	9/19/2006	Adelphia cust did not get notice of acquisition.
Mohammad	IN	PUC	69734	9/18/2006	9/21/2006	9/22/2006	Telemarketing order. Claims he did not authorize switch. Voice on TPV was a woman's voice. Wrote off balance
Elizabeth		FCC	06-W12194322	9/7/2006	9/25/2006	9/25/2006	hit credit limit on intrnl. calls, complained we did not notify her of credit limit
Maria	OH	PUC	MBAR092706ZD	9/27/2006	9/29/2006	9/29/2006	Former Adelphia cust, kept getting Low Usage Fee & late fees after final bill, credited LUF & late fees, terminated acct
Henry	NY	PSC	628520	9/28/2006	10/3/2006	10/9/2006	complaint over LUF, explained the LUF (and how to avoid it) to cust via phone message

Judson	FCC	06-W12158213	8/29/2006	10/6/2006	10/17/2006	complaint over LUF, explained the LUF (and how to avoid it) in response to FCC
Carroll	FL PSC	715105T	10/12/2006	10/12/2006	10/19/2006	disputed calls and said he did not sign up with Pioneer. Calls were valid and TPV had his voice on it. No adjustment.
George	FCC	06-W12251225	9/25/2006	10/19/2006	10/20/2006	same complaint as previous on in July. Responded to FCC re:same. No further adjustment.
Mary	PA AG	E-004114-2006	10/15/2006	10/30/2006	10/30/2006	Adelphia cust did not get notice of acquisition.
Patricia	FCC	06-W12299478	10/6/2006	10/30/2006	10/31/2006	questioning the business line federal tax and the Telecom Infrastructure Fee. Sent explanation to her and FCC.
Rasendra	CA PUC	06-04-8059	10/6/2006	10/30/2006	11/2/2006	complained about late fees over bill under \$1 - no adjustment made, he did not pay for 4 months.
William	FL PSC	718235T	11/9/2006	11/9/2006	11/9/2006	said he didn't receive copies of past bills. We previously sent copies to Ohio address on 8/18. sent additional copies
Judith	FCC	06-B0252146	10/4/2006	11/9/2006	11/13/2006	Disagreement over TFN charges. Resp that rates are unchanged, TFN charges are hers
Brenda	FCC	06-S0248414	9/1/2006	11/13/2006	11/14/2006	Adelphia cust received Sprint bill after they cancelled w/us - requested the complaint be redirected to Sprint
Ricky	KY PSC	2006-03417	11/17/2006	11/17/2006	11/20/2006	Dispute over rate to Russia - agreed to re-rate, issued \$770.80 + taxes credit
Holmes	FCC	06-W11788171	5/10/2006	11/20/2006	11/21/2006	cust said he called to cancel - we have no record - no adjustment made, full amount due
James	OH PUC	JSCO112106Y3	11/22/2006	11/22/2006	11/28/2006	Adelphia cust complained about LUF and questioned bill cycle dates. Explained LUF and gave dates of bill cycle
Fred	FCC	06-10255324	11/3/2006	11/27/2006	11/28/2006	Adelphia cust complained about LUF. Explained LUF and how to avoid it.
Wilfred	NH PUC	WJT v PT	12/7/2006	12/18/2006	12/18/2006	Adelphia cust complained about LUF. Explained LUF and how to avoid it.
Esther	FCC	06-R211319	12/4/2006	12/15/2006	12/18/2006	upset over collection fees - Sharlene waived most if paid by due date - cust paid, closed account.
Raymond	FCC	06-10256985	11/21/2006	12/15/2006	12/19/2006	upset over small amount (\$3) due after cancellation - wrote off