

TENNESSEE REGULATORY AUTHORITY

Eddie Roberson, Chairman
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460 James Robertson Parkway
Nashville, Tennessee 37243-0505

October 4, 2007

Mark Stern
GoAmerica Relay Services Corp.
433 Hackensack Ave., 3rd Floor
Hackensack, NJ 07601

Dulaney O'Roark III
Verizon
5055 North Point Parkway
Alpharetta, GA 30022

Re: Docket No. 07-00204 – Joint Petition of Verizon Communications Inc., MCI Communications Services, Inc. D/B/A Verizon Business Services, Verizon Services Corporation and GoAmerica Relay Services Corp. for Expedited Approval of the Assignment of the Contract to Provide Relay Services from Verizon Services Corporation to GRSC, for GRSC to Utilize Stellar Nordia Services, LLC as a Subcontractor in the Performance of the Contract, and for the Transfer of Related Assets from Verizon Business Services to GRSC.

Docket No. 07-00205 – Application of GoAmerica Relay Service Corp. for a Certificate to Provide Competing Local Telecommunications Services.

Dear Messrs. O'Roark and Stern:

In order to fully analyze the above-referenced filings, the Tennessee Regulatory Authority requires additional information. Please provide the information requested below by October 11, 2007, and refer to this correspondence as Data Request No. 2 in the response.

1. GoAmerica Relay Service Corporation's ("GRSC") data response indicates that GRSC will rely on both Verizon's and Stellar Nordia's operating platforms and expertise to meet the technical sufficiency requirement of the CCN and fulfill the obligations of the TRS contract. Specifically, which TRS services will be provided using Verizon's platforms? Which Verizon platform will be used to provide the respective service? Which TRS services will be provided using Stellar Nordia's platforms? Which Stellar Nordia platform will be used to provide the respective service?
2. Provide legal justification for GRSC's position that Stellar Nordia does not need a CCN from the Authority.
3. Discuss the status of GRSC's efforts to procure the \$200,000 performance bond as required by Section E.3 the TRS Contract. Also, provide an update on the

status of GRSC's acquisition of a \$20,000 corporate surety bond or irrevocable letter of credit pursuant to T.C.A. § 65-4-125.

4. The Joint Petition filed in Docket No. 07-00204 requests assignment of the TRS Contract pursuant to Section D.5, which concludes with the following statement: "Notwithstanding any use of approved subcontractors, the Contractor shall be the prime contractor and shall be responsible for all work performed." Does Verizon intend to retain the role of TRS Contract Prime Contractor? If not, would modification of the contract under Section D.2 be a more appropriate provision?
5. Section D.5 of the TRS Contract requires State approval of subcontracts to perform services required by the TRS Contract. Provide a true and accurate copy of the subcontract between GRSC and Stellar Nordia to subcontract services under the TRS Contract. Also, summarize GRSC's discussions with other officials within Tennessee State government that must approve subcontracts and modifications related to the TRS Contract.
6. Section 9.5.2 of the "Managed Services Agreement" referenced in the Data Response to question 8, reads "GoAmerica also may direct Stellar to close one or more of the Subject State TRS call centers (i.e., Memphis, TN and Riverbank, CA) that supply Stellar Services to the Subject TRS contracts and consolidate the Stellar Services at such other locations as Stellar, at its sole discretion may choose, provided, however, that GoAmerica (a) shall provide Stellar with ninety (90) days prior written notice; and (b) shall simultaneously provide Stellar with a legal opinion, reasonably satisfactory to Stellar's counsel, opining that the requested closure of the State TRS call center is lawful together with appropriate supporting documentation; and (c) shall continue to pay Stellar the Transition Fee." (A) Please indicate how the Petitioners will comply with Section A.11 of the TRS Contract if the Memphis call center is closed? (B) Please provide all documents and information possessed by GoAmerica, GRSC or Stellar Nordia pertaining to closure of the Memphis Call Center under Section 9.5.2 of the Managed Services Agreement. (C) Provide all legal arguments that may justify closure of the Memphis call center under the TRS Contract. If no such legal argument exists, please indicate so.

If you have any questions or need further assistance, please call Lisa Foust at 615-741-2904, ext. 220 or e-mail her at Lisa.Foust@state.tn.us. Please respond by sending the original and 13 copies either by U.S. Mail or express mail. Alternatively, you may send the original and four (4) copies along with an electronic file to:

Ms. Sharla Dillon, Docket Room Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
Sharla.dillon@state.tn.us

Sincerely,

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

Jerry Kettles, Chief
Economic Analysis & Policy Division

Cc: Melvin Malone (via Fax)
Dana Frix (via Fax)