

# TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

December 12, 2007

Catherine M. Hannan  
Helein & Marashlian, LLC  
The CommLaw Group  
1483 Chain Bridge Road  
Suite 301  
McLean, VA 22101

RE: Docket No. 07-00264, *Application of Starvox Communications, Inc. for a Certificate to Provide Competing Local Exchange and Long Distance Telecommunications Services in Tennessee.*

Dear Ms. Hannan:

CLEC applicants are required, by statute, to demonstrate their managerial, financial and technical abilities to provide the services for which they seek authority. To assist the Authority in its review of Starvox Communications, Inc.'s application for Certificate of Convenience and Necessity to provide competing local exchange and long distance telecommunications services in Tennessee, you are requested to provide the following information:

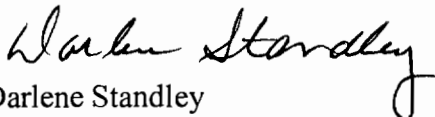
- 1) T.C.A. § 65-4-125 states that, "by September 1, 2000, all telecommunications service providers subject to the control and jurisdiction of the authority, except those owners or operators of public telephone service who pay annual inspection and supervision fees pursuant to § 65-4-301 (b) or any telecommunications service provider that owns and operates equipment facilities in Tennessee with a value of more than five million dollars (\$5,000,000), shall file with the authority a corporate surety bond or irrevocable letter of credit in the amount of twenty thousand dollars (\$20,000) to secure the payment of any monetary sanction imposed in any enforcement proceeding, brought under this title or the Consumer Telemarketing Protection Act of 1990, by or on behalf of the authority."

Please provide a \$20,000 corporate surety bond or irrevocable letter of credit. This bond or letter of credit will be verified by the Authority prior to consideration for authority.

- 2) Will Starvox Communications, Inc. provide access to 911 and E911 emergency services, white page directory listings and directory assistance, provide access to and support for the Tennessee Relay Center in the same manner as incumbent local exchange companies, provide free blocking service for 900/976 calls, provide Lifeline and Link-Up services to qualifying citizens of this state and provide educational discounts in existence as of June 6, 1995?
- 3) Exhibit I, titled ILEC Service List, did not indicate that the ILECs listed have been provided with notice of this filing. Please provide a written certificate of service indicating notice of this application has been provided to all eighteen (18) ILECs in Tennessee with a statement indicating which areas of the state the applicant intends to serve. The certificate of service should also indicate the date that such notice was provided to the ILECs.
- 4) Provide further information regarding sources of funding for operations in Tennessee. Include loan commitments, lines of credit obtained, or any other financing arrangements available to Starvox Communications, Inc.
- 5) Provide a sworn statement from an authorized company representative that all applicable state and federal laws and all TRA rules will be adhered to.
- 6) How does Starvox Communications, Inc.'s billing system enable the company to comply with Tenn. Code Ann. § 65-21-114? How does this system, as stated in the application, differ from traditional circuit-switched carriers?
- 7) Who is the parent company of Starvox Communications, Inc. (the applicant in this docket)? Page 2 of the application states that the applicant is a wholly-owned subsidiary of Starvox Communications, Inc.

Please provide the above information by December 26, 2007. In accordance with TRA Rules, please submit either (1) thirteen written copies of your response or (2) four written copies and an electronic version and reference docket number 07-00264 on the correspondence. If you have questions concerning this request or need additional information, please contact Lisa Foust at 615-741-2904 extension 220.

Sincerely,

  
Darlene Standley  
Utilities Division Chief