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March 24, 2009

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

filed electronically on 03/24/09

Ms. Darlene Standley
Utility Division Chief
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
(615) 741-3939

Re: BLC Management LLC d/b/a Angles Communication Solutions
Docket No. 08-00040

Dear Ms. Standley:

Enclosed please find for filing an original and four (4) copies of **follow-up** responses to Data Request No. 1 for BLC Management LLC d/b/a Angles Communication Solutions. This filing has been electronically submitted on March 24, 2009.

APPLICANT HAS ALSO ENCLOSED ONE COPY OF ITS RATE CENTERS IN A SEPARATE ENVELOPE AND HEREBY RESPECTFULLY REQUESTS CONFIDENTIAL TREATMENT OF THE ENCLOSED RATE CENTERS THAT CONTAINS CONFIDENTIAL AND PROPRIETARY INFORMATION. APPLICANT EXPECTS THAT THIS INFORMATION WILL BE RESTRICTED TO COUNSEL, AGENTS AND EMPLOYEES WHO ARE SPECIFICALLY ASSIGNED TO THIS APPLICATION BY THE COMMISSION.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me.

Respectfully submitted,

Lance J.M. Steinhart
Attorney for BLC Management LLC
d/b/a Angles Communication Solutions

Enclosures

Question No. 1 Pursuant to Authority Rule 1220-4-8-.04(3)(b)(5), provide a cite in BLC's tariff describing BLC's Lifeline offering. In the absence of such cite, BLC must submit its Lifeline tariff for Authority approval.

RESPONSE: BLC will be amending its tariff to add Lifeline provisions.

Follow-up Request: Please provide a tariff for Lifeline and Link Up.

RESPONSE: Under separate cover, BLC has submitted its tariff revision pages for approval on March 24, 2009. Attached as Exhibit A, please find a copy of the cover letter reflecting submission to the Tennessee Regulatory Authority.

Question No. 3 Identify, by rate center, where in Tennessee BLC is providing local residential and business telecommunications services.

RESPONSE: BLC's residential service is available throughout the AT&T service territory, and is being provided in numerous rate centers

Follow-up Request: BLC's response needs clarification by identifying the rate centers where it is providing service. Additionally, BLC needs to identify by each rate center whether services are provided by resale or by leased UNEs.

RESPONSE: BLC is currently providing service throughout Rate Centers covered by the AT&T and a small number of Embarq ILEC footprints attached as Exhibit B which is being filed in a separate sealed envelope as "Confidential". Services are provided via resale.

Question No. 4 Provide copies, or instruction on where to locate BLC's current advertising of its services to Tennessee consumers.

RESPONSE: BLC currently advertises in merchant retail locations in Tennessee

Follow-up Request: Provide additional detail where BLC advertises, by what means, and provide copies of BLC's advertisements with the response.

RESPONSE: BLC is currently advertising via in-store merchant marketing materials per attached examples as well as through local newspaper and direct mail advertisement per attached example as Exhibit C.

Question No. 5 Does the company offer services to customers other than Lifeline customers? If so, provide the connection charge and the monthly recurring charges for these customers.

RESPONSE: All BLC customers pay the same fees and charges

Follow-up Request: Lifeline customers receive a reduction from basic service rates via credits from federal and state funding. Identify BLC's basic service recurring and non-recurring rates and charges and indicate the amount of BLC's Lifeline credits and Link Up service rate reductions.

RESPONSE: BLC customers whom do not qualify for lifeline are provided base service rates without the lifeline discount deduction. We currently charge no connection cost for lifeline and non-lifeline customers as we are engaged in a "First Month Free" promotion whereby no connection fee is accessed. Rate sheet as Exhibit D attached.

Question No. 6 Is BLC planning to offer Lifeline customers the option of either subscriber services or monthly pre-paid services as both are described in BLC's tariffs.

RESPONSE: Yes

Follow-up Request: If the rates and charges are different depending on whether a customer elects to subscribe to regular basic service or opt for month-by-month prepaid services, identify the charges for each.

RESPONSE: BLC will only be offering month by month prepaid services.

Question No. 10 Provide a specific description of how the company will use federal universal service support it would receive as a designated ETC.

RESPONSE: Since the company is requesting only Lifeline and Link-Up support, all support will be directly applied to a customer's bill

Follow-up Request: Provide specific information regarding benefits and/or services Tennessee consumers may realize by subscribing to BLC's services that are not provided by existing carriers. Further does BLC plan to provide its services by reselling services of other facility based providers.

RESPONSE: BLC was one of the first companies to provide prepaid customers the option of trying prepaid residential services for free for the first 30 days with no connection fee and no commitment. We also are one of the few that provide 24/7 customer support. Most competitors have limited service support hours typically ending at 5 or 6 pm and then an afterhours service that only takes information for call back. In addition to paper invoices, BLC provides courtesy calls monthly to our customers reminding them a bill is due/past due and a final notice prior to disconnecting service to ensure

we have made every effort to keep our customers informed to avoid service interruptions and reconnection fees. We also are one of the few providers that offer convenient flat rate pricing to help our customer base better manage their expected monthly payment.

Question No. 11 Describe BLC's plans for demonstrating to the Authority that for those Lifeline customers served via resale of another carrier's services, BLC is not receiving the federal universal service Lifeline credit from the serving company and filing for credit with the Universal Service Administration Company.

RESPONSE: BLC has hired a Third Party Vendor who specializes in the area of tracking and auditing Lifeline assistance program information. The Third Party Vendor will maintain BLC's records and remit the required documentation on both State and Federal levels. BLC will maintain a copy of its records at its corporate offices.

Follow-up Request: Identify and provide current contact information for BLC's contracted Third Party Vendor.

**RESPONSE: CGM, LLC / 101 Vickery St Roswell GA 30075
Ph: 678-296-7505**

Additional Information Requirements:

During the ongoing review it is noted that BLC does not have any Wireline Activity Reports on file with the Authority. In accordance with the requirements established in Authority Docket No. 97-00309, BLC is required to file a Wireline Activity Report monthly. Submit a copy of BLC's most recent report with BLC's response.

RESPONSE: Please find a copy of the recent Wireline Activity Report submission attached as Exhibit E. BLC Management, LLC since inception within the state of Tennessee was not familiar with the Wireline Activity Report. Upon now learning that it is due monthly we are submitting the most recent months wireline activity and upon request we will be more than happy to go back and get any previous wireline activity data requested.

EXHIBIT A

Coverletter submitted under separate cover for approval of tariff
revisions to include Lifeline and Link Up language

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March 24, 2009

VIA OVERNIGHT MAIL

Honorable Jones, Chairman
Attn: Sharla Dillon, Dockets
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-9021
(615) 741-3939

Re: BLC Management LLC d/b/a Angles Communication Solutions

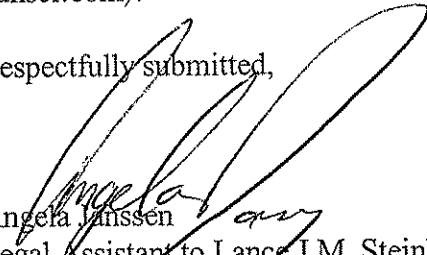
Dear Ms. Dillon:

Enclosed please find for filing an original and four (4) copies of tariff revisions to BLC Management LLC d/b/a Angles Communication Solutions Tariff No. 1 with an effective date of April 27, 2009. This filing has also been sent via e-mail to sharla.dillon@state.tn.us on March 24, 2009.

These tariff changes reflect the incorporation of Lifeline and Link Up language.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope. If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me via phone (678.775.2253) or email (ajanssen@telecomcounsel.com).

Respectfully submitted,



Angela Janssen
Legal Assistant to Lance J.M. Steinhart
Attorney for BLC Management LLC
d/b/a Angles Communication Solutions

Enclosures

cc: Mr. Brian Cox

EXHIBIT B

Rate Centers

EXHIBIT C

Advertisements



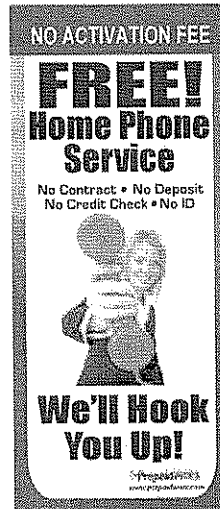
10" x 10" Styrene English Gas Pump w/ Tape



10" x 10" Styrene Wireless Gas Pump w/ Tape English



18" x 24" UV Poster



3.5" x 8.5" Flyer on 100# Gloss Text



Doesn't matter if you are behind on your current phone company bill!
Additional discounts if you receive government assistance.

Due to an overwhelming response to this offer, we have made available two ways to sign up.
If you call and get a busy signal, please either call back, or visit our web site listed below to sign up!



Sample Newspaper and Advo Ad

PICK YOUR FREE PLAN
GET THE FIRST MONTH FREE!

FREE PLANS

FREE BRONZE PLAN

- Unlimited Local Calling
- 911 Access
- Free \$3 in Long Distance

FREE SILVER PLAN

- Unlimited Local Calling
- Caller ID Deluxe
- Call Waiting Deluxe
- 911 Access
- Free \$3 in Long Distance

FREE GOLD PLAN

- Unlimited Local Calling
- Unlimited Long Distance
- Caller ID Deluxe
- Call Waiting Deluxe
- Three-Way Calling
- Call Return & 911 Access

PLAN PRICING

Plan	Regular Price (Includes Taxes & Fees)	Special Price (Includes Taxes & Fees)
Bronze Plan	\$45 per month	\$39 per month
Silver Plan	\$55 per month	\$45 per month
Gold Plan	\$65 per month	\$55 per month

NO ACTIVATION FEE

FREE! Home Phone Service

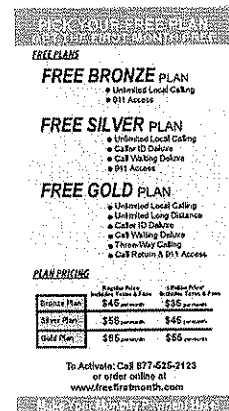
No Contract • No Deposit
No Credit Check • No ID

We'll Hook You Up!

8.5" x 11" Trifold Flyer on 100# Gloss Text



5" x 4" Counter Card English with stand



3.5" x 8.5" Flyer on 100# Gloss Text

EXHIBIT D

Rate Sheet

Service Application for FREE Month of Home Phone Service

Home Phone Agent ID

Home Phone Agent ID Must Be Placed On Form For Application To Be Processed.
To Request Your Agent ID, Please Call 877.277.8899

No Credit Check - No ID - No Deposit - No Up Front Payment - 1 Month Totally FREE!

FREE PLANS

Please fax application to 877-751-8209

☐ Free Bronze Plan

Package Details:

- Unlimited Local Calling
- 911 Access

☐ Free Silver Plan

Package Details:

- Unlimited Local Calling
- Caller ID Deluxe
- Call Waiting Deluxe
- 911 Access

☐ Free Gold Plan

Package Details:

- Unlimited Local Calling
- Unlimited Long Distance
- Caller ID Deluxe
- Call Waiting Deluxe
- Three-way Calling
- Call Return
- 911 Access

PLAN PRICING

	Regular Price Includes Taxes & Fees.	Lifeline Price** Includes Taxes & Fees
Bronze Plan	\$45 per month	\$35 per month
Silver Plan	\$55 per month	\$45 per month
Gold Plan	\$65 per month	\$55 per month

- **To qualify for the lifeline price, someone in your household must be on Government Assistance. Please see below for list of government programs that apply and fill out Lifeline Self-Certification at bottom of page.

- If you have existing service, you will keep your same number and your service will not be interrupted. Conversions take only 24 hours to process.

- If you are getting a new installation, then your service will be installed for free in 1-7 business days.

☐ New Installation

☐ Conversion ()

Telephone Number

Name (Exactly as it should appear on your telephone bill)

Contact Number (cell or friend)

Physical Street Address - where the service will be activated

City

State

Zip Code

Mailing Address ☐ Check here if mailing address is same as above

Mailing Address - where your mail is delivered (P.O. Box etc.)

City

State

Zip Code

INITIAL EACH OF THE BULLET POINTS BELOW AFTER READING

ACS/DTM will not provide connection to, or the installation of phone jacks. ACS/DTM will provide dial tone to the customer interface box. ACS/DTM is not responsible for inside repair problems due to wiring, jacks, equipment etc.

Most new connections will be installed in 2-5 business days however installations can take up to 15 business days due to possible field work dictation by AT&T

Lifeline Self-Certification

I testify that I or someone that lives at the address above is on government assistance such as listed below. (\$10 monthly rebate on your service starting in month 2)

Please checkmark which programs you qualify for: ☐ Temporary Assistance to Needy Families (TANF) ☐ Supplemental Security Income (SSI) ☐ Food Stamps
☐ Medicaid ☐ Senior Citizen Low Income Discount ☐ Federal Public Housing (Section 8)

"I agree that I am responsible for notifying my phone company, ACS/DTM, immediately if my status changes and I no longer qualify for any of the afore mentioned programs."

I designate Angles Communications Solutions (ACS) or Dialtone and More (DTM) as my agent for purposes of changing my local carrier and PIC-LPIC (interstate/intrastate carrier of ACS/DTM). I understand that any service or billing issues can be resolved by calling 877-264-5375 or by visiting telephonehelp.net. Local service is subject to various federal and local charges. This is a month to month agreement with a minimum of 30 days and payments are non-refundable. I authorize ACS/DTM to take all actions possible to keep my service active including switching my service to alternate carriers. Calls to 1-411, party lines, chat lines or outside the 48 contiguous states will result in loss of long distance (LD) privileges. LD may not be used for any data transfer including internet. Payments must be made by the due date to avoid interruption. Fees will apply to turn service back on after interruption. I understand that I am required to make my first payment upon 30 days after my installation date to continue my next month's service or service will be disconnected.

Customer Signature

Print Name

Date

Customer Service: Toll Free: (877) 264-5375 Fax (877) 751-8209 www.freefirstmonth.com

BS/SBC

EXHIBIT E

Wireline Activity Report

Tennessee Counties

Counties A - G

Anderson County
Bedford County
Benton County
Bledsoe County
Blount County
Bradley County
Campbell County
Cannon County
Carroll County
Carter County
Cheatham County
Chester County
Claiborne County
Clay County
Cocke County
Coffee County
Crockett County
Cumberland County
Davidson County
Decatur County
DeKalb County
Dickson County
Dyer County
Fayette County
Fentress County
Franklin County
Gibson County
Giles County
Grainger County
Greene County
Grundy County

Counties H - N

Hamblen County
Hamilton County
Hancock County
Hardeman County
Hardin County
Hawkins County
Haywood County
Henderson County
Henry County
Hickman County
Houston County
Humphreys County
Jackson County
Jefferson County
Johnson County
Knox County
Lake County
Lauderdale County
Lawrence County
Lewis County
Lincoln County
Loudon County
Macon County
Madison County
Marion County
Marshall County
Maury County
McMinn County
McNairy County
Meigs County
Monroe County
Montgomery County
Moore County
Morgan County

Counties O - W

Obion County
Overton County
Perry County
Pickett County
Polk County
Putnam County
Rhea County
Roane County
Robertson County
Rutherford County
Scott County
Sequatchie County
Sevier County
Shelby County
Smith County
Stewart County
Sullivan County
Sumner County
Tipton County
Trousdale County
Unicoi County
Union County
Van Buren County
Warren County
Washington County
Wayne County
Weakley County
White County
Williamson County
Wilson County