

Lance J.M. Steinhart, P.C.
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

RECEIVED
2009 AUG 24 AM 10:07
T.R.A. DOCKET ROOM

Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

August 10, 2009

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

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

filed electronically in docket office on 08/11/09

Re: dPi Teleconnect, LLC
Docket No. 08-00025

Should be 08-00114

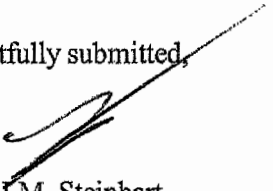
Dear Ms. Standley:

Enclosed please find for filing an original and four (4) copies of the Additional Information responses to Data Request No. 1 for dPi Teleconnect, LLC. This filing has been electronically submitted on August 10, 2009.

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 dPi Teleconnect, LLC

Enclosures

Question No. 1

Identify, by rate center, where in Tennessee dPi is currently providing local residential and business telecommunications services. Identify with each listed rate center whether services are provided by resale, by leased UNEs or both. Additionally, identify the number of lines where service is provided by UNE.

dPi's Response: dPi follows the provisioning wire centers of the Incumbent LEC. A LWC contract is in place with the Incumbent LEC and we will be using a combination of both Resale and UNE in all centers.

In addition to the Attached Exhibit 1 of the Application listing switch identification codes, dPi must provide a complete listing of rate centers where dPi is currently and/or is planning to provide services. With each rate center listed, identify the number of lines in use. (dPi has submitted a Wireline Activity Report showing counties and the number of lines shown as in service in each county listed, not each rate center).

Response: Rate centers were originally filed with Application. Attached please find the list of rate centers along with the numbers of lines in use.

Question No. 2

Provide copies of, or instruction on where to locate dPi's current advertising of its services to Tennessee consumers. Further describe where the advertisements are being distributed and by what means.

dPi's Response: dPi Teleconnect service offerings can be viewed by logging on to our website at <http://dpiteleconnect.com>. You will also be able to find a payment/Vender location where our advertisements are distributed.

In dPi's Application, at ¶ 15, dPi states "dPi will announce and advertise...where it provides service...and will publicize the availability of Lifeline and Link-Up services in a manner reasonable designed to reach those likely to qualify for those services."

Provide copies and/or other information, other than a web site, detailing dPi's advertising of its Lifeline and Link Up service offerings as specified in dPi's tariff at 4.1.1.C and 5.1.1.C, and include where distribution is made and by what means.

Response: Attached is an example of Lifeline advertizing used in other states where dpi is designated an ETC. Our advertizing is based on geographic area and may not be utilized the same in all states or areas.

Exhibit A

Question No. 4

Explain dPi's method of access and/or local service switching. If switching is obtained from another carrier by lease, what are dPi's transition plans for facilities based switching if any.

dPi's Response: This is not applicable to the type of service provided by dPi.

Explain in full detail why access and/or local service switching is not applicable to dPi.

Response: dPi has approved contracts with the local Incumbents to purchase both resale and facility type service. Customer service orders will be processed with the ILEC based on the type of products ordered by our customer. Once ETC designated we will utilize product ordering under both types of service contracts.

Question No. 5

Outline dPi's plans for ensuring its customers continue receiving telecommunications services should AT&T relinquish a particular service area and no carrier assumes such service area.

dPi's Response: dPi follows the Incumbents service areas. If AT&T relinquishes a particular service area and no other carrier assumes that area then we would no longer be able to service unless we are able to obtain a contact with a carrier which we could port the lines to.

In dPi's Application, dPi states at ¶ 17 it "...is willing to accept carrier of last resort obligations throughout the universal service areas in which dPi is designated as an ETC..."

Provide detailed explanation of how dPi would be able to assume "carrier of last resort obligations," and why dPi would no longer be able to serve should AT&T relinquish an area.

Response: "Carrier of last resort obligations" when stated is relating to providing available local phone service to those customers who can no longer get approval for service with other carries based on credit or past payment history. dPi provides service to these types of customers to insure they have the ability of phone communication.

Question No. 6

Describe dPi's plans for demonstrating to the Authority that for those Lifeline customers served via resale of another carrier's services, dPi is not receiving federal universal service Lifeline credit from the servings company and filing for credit with the Universal Service Administration Company.

dPi's Response in part: "dPi has partnered with a third party Vendor for filing our 497s. With this partner we have created procedures that safe guard our information so this does not happen..."

Provide copies of past reports, communications and/or documents, as identified in dPi's response that will act as a "safeguard," ensuring dPi does not claim Lifeline subsidies from the universal service fund after receiving the same discounts from the ILEC.

Response: Each month dPi prepares a monthly data file pulled from each of our operating systems that identifies certified end users that receive a Lifeline credit from us in that month. This file is then forwarded to a third party vender whom then processes the inform necessary in preparing our 497 form. This Vender has also been retained by dPi to house our ILEC invoice information. Their system maintains customer cost detail by USOC received on invoices from the ILEC for each of our customers. Our vender then queries the database to identify cost detail for each WTN listed on the 497 form. If it is identified that we have received Lifeline subsidies from the ILEC for a customer listed on the 497 than that TN is tagged as non eligibility for government subsidies and removed from the 497 calculations. A separate report is generated and submitted to us containing these customers for further review.

Exhibit B

Additionally, it is noted that the information provided by dPi indicates dPi is providing services only through resale of another carrier's services.¹ Describe, in detail, dPi's plans to convert resold services to, or begin offering services through, UNEs, using its own facilities or employing a combination of the two.

Response: dPi currently has contracts to process orders thru resale or facilities with the underlining carriers. Once ETC designation is obtained dPi will process orders utilizing a combination of both resale and facilities contracts based on products orders, least cost provisioning and product switch availability.

¹ May 12, 2009 response to Data Request No. 1, Attached April 2009 Wireline Activity Report.

Exhibit A

For only \$12/mo. Add High Speed Unlimited

dPi offers
**4 Home Phone *
Service
packages**

**Quality
Home Phone
Service** with no
hassles

Low Weekly & Monthly Rates!!

AS LOW AS \$9.99**
per week plus taxes & fees (Lower Rates Available for Qualified Customers.)
Call for details.

• **Lifeline**

Includes: Unlimited Local Calling,
(For qualified customers only. Not available in all areas. Ask agent for details.)

• **Basic**

Includes: Unlimited Local Calling,
dPi Club Program

• **Advantage**

Includes: Unlimited Local Calling, Call Waiting
Deluxe & Caller ID Deluxe, dPi club program

• **Premier**

Includes: Unlimited Local Calling, Call Return,
Busy Redial, Call Waiting Deluxe, Caller ID Deluxe
& 3-Way Calling, dPi club program



Through new advances in technology and communication, we have streamlined our sales systems to make it easier for Rent-A-Center coworkers to assist the customer in hand-picking the home phone services and features they need. Combined with our best class relations, it's easy to see why Rent-A-Center chooses dPi to serve our valued customers everyday.



being used for any reason inconsistent with normal residential telephone use.
Prices shown are basic service with 2,000 Long Distance minutes only.
*depending on the package chosen.
**the package and features you select.

d. No Long Term Obligation!

Go Home Phone

Pay By The Day! Pay By The Week!

Pay as You Go, provides flexible payment plans with daily, weekly, monthly, and bi-monthly rates.

Just pay your 1st month in advance, then you can *Pay as You Go!*

You can buy home phone service for a day, a week, a month or as long as you need!

It's as Easy as 1-2-3!

Visit a Rent-A-Center store near you

or Call Toll-Free 877-JOIN-dPi

or Visit www.joindPi.com



2 Pick a home phone package
that best fits your lifestyle.

3 Make initial Payment
and activate your service to start talking.

Not available in all Rent-A-Center Stores. Check with your local Rent-A-Center store for service availability.

connect reserves the right to terminate, suspend, or restrict any service without notice. If it is determined that the calling service is
offers only available for new customers. Plans vary by location. Package features may vary by carrier area. Plus taxes and fees.
Prices indicate dPi's prompt-pay discount. First month payment usually costs between \$60 to \$1
*Your average monthly phone bill after fees and taxes will be from \$43 to \$80. Again, depending on

Deposit. No Credit Check. No I.D. Required

Exhibit B

PROCESS STATE	WTN	ETC/ELC	ADD/ISSY/RT/US	CD/DP/RO	BASE/ASG	CLST NAME	MONTH-BEGIN	MONTH-END	Line count	BAV	BILL DATE	ADDR01	ADDR02	CITY	ZIP
2009-02	NC	3366892214	N	ASG found on Billing Record	Y	KRISTIANBERKMAN	2/1/2009	2/28/2009	1	7040888437	2/8/2009	4720 OLD JULIAN RD		JULIAN	27283
2009-02	NC	9100287731	N	ASG found on Billing Record	Y	ELENYBARNES	2/1/2009	2/28/2009	1	7040888437	2/8/2009	85 AMACONDA RD		FARMCOUNT	28340
2009-02	NC	9194042375	N	ASG found on Billing Record	Y	EDUARASCIN	2/1/2009	2/28/2009	1	7040888437	2/8/2009	110 SHANNON ST		ZEBULON	27587
2009-02	NC	9198367542	N	ASG found on Billing Record	Y	JOANNLUCAS	2/1/2009	2/28/2009	1	7040888437	2/8/2009	2525 STEWART DR		RALEIGH	27603