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July 23, 2010

**VIA ELECTRONIC FILING**  
**AND OVERNIGHT DELIVERY**

Filed electronically in the Docket  
Office 7/23/2010

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

Re: LifeConnex Telecom, LLC  
Docket No. 09-00109

Dear Ms. Standley:

Enclosed please find for filing an original and four (4) copies of the responses to additional information requested for LifeConnex Telecom, LLC. This filing has been electronically submitted on July 23, 2010.

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 LifeConnex Telecom, LLC

Enclosures

Question No. 1

Section 54.201 (d)(2) states, "Advertise the availability of such services and the charges therefore using media of general distribution and Section 54.405 (b) states, "Publicize the availability of Lifeline service in a manner reasonably design to reach those likely to qualify for the services." Therefore, provide actual advertisements you plan to use for Lifeline services, showing the prices for services, connection fee, and describe the means used for distribution of the provided advertisements.

**RESPONSE:** *Ads are delivered via Advo / Valassis to residents in select zip codes. Ads are sent in various sizes including 5x7 and 10x11. Service and product information included on ads includes offer for Free Month of home phone service for new customers, \$19.99 per month service fee starting second month, savings of \$13.50 per month if they qualify for Lifeline discount and \$30 for Link Up qualification which helps waive the customer connection fee. Ads also include information about Caller ID, Call Waiting, Included Long Distance minutes, and available Toll Limitation / 1+ Dialing.*

Question No. 2

LifeConnex provided the names of media and some contact information in the data response dated May 27, 2010; please provide copies of the information given out by these agencies.

**RESPONSE:** *Valassis -www.valassis.com. Please see attached ads.*

Question No. 3      The response provided in the May 27, 2010 data response for question No. (3) did not indicate the tariff cites, connection rates, hookup discount or copies of advertisements that accurately specify these rates and discounts. Please provide the information requested and explain the discrepancy in the tariff lifeline rate and the advertised rate provided "as low as \$20.00 per month."

**RESPONSE:** *Service and product information included on ads includes offer for Free Month of home phone service for new customers, \$19.99 per month service fee starting second month, recurring savings of \$13.50 per month from the Lifeline / \$30 for Link Up program which helps waive the customer connection fee. The tariff on file reflects rates from 2008. LifeConnex will have to amend the tariff to reflect the current rate of \$33.49 rate per month.*

Question No. 4      Describe the facilities provided by 321 Communications in Tennessee. Also, explain where and how these facilities are interconnected to the PSTN through the ILEC in Tennessee.

**RESPONSE:** *321 Communications network facilities are located in Atlanta, GA and New York. 321 Communications leases dedicated circuits and or transport from ILECs using their facilities in markets where 321 Communications does not have a direct presence.*

Question No. 5      Explain the necessity and purpose for the language, "I designate my local telephone company as agent for purposes of changing my PIC-LPIC.", on the Lifeline application used by LifeConnex that results in an automatic waiver of the subscribers' carrier of choice option once a subscriber signs the application. Would LifeConnex be willing to remove this language?

**RESPONSE:** *Please see amended LifeLine form with amended verbiage. Unless otherwise electing to opt for a different long distance provider, LifeConnex will designate the provider.*

Question No. 6

Provide the contact information for Lost Key Telecom and describe its process used for data collection, information retention, and reporting for LifeConnex as to where services are being provided, and explain any changes that may be required for services in Tennessee when those services are launched.

**RESPONSE:** *Lost Key Telecom, Inc. is a consulting firm that provides strategic managerial and technical advice to clients in the telecommunications industry. Steve Watson is the Executive Director of Lost Key Telecom. The company can be reached at (888)259-6057. LifeConnex is contracted with Lost Key Telecom to provide the analysis to determine the method of providing service to customers. Electronic files from the ILEC is uploaded into Lost Key's proprietary software system, ark, where it is stored and allows Lost Key to run all necessary reports for LifeConnex. Lost Key manages information for LifeConnex in every state where they have a presence and they will not require any change in service once LifeConnex begins service in Tennessee.*

Question No. 7

Please describe in detail facilities which LifeConnex is planning to install. Also indicate the rate centers where facilities will be installed, target dates for installation, and target dates for offering services.

**RESPONSE:** *At this time LifeConnex does not have plans at this time to install facilities in Tennessee.*

LET US HELP YOU WITH YOUR BILLS BY GIVING YOU A

# FREE MONTH OF HOME PHONE SERVICE

PHONE  
BILL



FREE\*  
  
PHONE  
SERVICE

With Lifeline/Link Up you can save up to \$100 on your first month which includes your free month (\$39.99), \$19.99 per month starting second month, and \$100 for your connection fee due to Link Up eligibility, for a total of \$269 savings a year! After your free month, you will continue to get your government discount and pay as little as \$19.99 per month. As a designated telecommunications carrier, we are eligible to receive universal service support. LifeConnex is proud to offer the Lifeline/Link Up programs.

\*First Month Free with no connection fee.  
\$19.99/month starting second month.

# 1-877-566-6073

**getlifeconnex.com**



# You May Qualify For **FREE PHONE SERVICE**

**Let the government pay for your home service!**

- ★ Caller ID
- ★ Call Waiting
- ★ FREE Long Distance
- ★ FREE 1st Month

If you are on any form of government assistance (Food Stamps, Social Security Income (SSI), Medicaid, Section 8 public housing, TANF, School Lunch Program), you may qualify for Lifeline/Link Up, a government discounted home telephone service.

Here is what you get: If you are on any form of government assistance (Food Stamps, Social Security Income, Medicaid, Section 8 Public Housing, TANF, School Lunch Program), you may qualify for government discounted home service—a free first month including new connections. With Lifeline / Link Up you'll save up to \$100 on your first month which includes your free month (\$33.49), \$13.50 per month starting second month, and \$30.00 for your connection fee due to Link Up eligibility, for a total of \$262 savings a year! After your free month, you will continue to get your government discount and pay as little as \$19.99 per month. As a designated telecommunications carrier eligible to receive universal service support, Life Connex is proud to offer the Lifeline / Link Up programs. We will provide discounts on service activation and on basic monthly service for residential customers who qualify for Lifeline service, customers may call (877)-566-6073.

Toll limitation and 1 + dialing are available to all Lifeline and Non-Lifeline customers.

**\$19.99**

**Per Month\***  
**(Starting 2nd Month)**

\*Plus taxes and fees

**877-566-6073**  
**getlifeconnex.com**

**Life**  
**Connex™**



**URGENT:**

**FILL OUT AND SEND BACK IMMEDIATELY**

This form (along with your Proof of Eligibility) must be completely filled out, signed and received by us in order for you to continue receiving your Government Assistance Benefits.

# TENNESSEE Lifeline / Link-up Application

LIFE CONNEX TELECOM, LLC DEPT # 0626 P.O. BOX 850001 ORLANDO, FL 32885-0626

1. Verify Your Information

Account Number

Last name First Name Middle Init.

Street Apt. Number

City State Zip Code

## ELIGIBILITY REQUIREMENTS

2. Select Your Box

I currently participate in or receive benefits from one of the following programs (Check All That Apply):

- |  |  |
|--|--|
| <input type="checkbox"/> Medicaid  | <input type="checkbox"/> Federal Public Housing Assistance (Section 8)   |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (Food Stamps) | <input type="checkbox"/> Household Income Based On Federal Poverty Guidelines (Must Provide Proof Of Income With Application To Qualify) |
| <input type="checkbox"/> Supplemental Security Income (SSI)                      | <input type="checkbox"/> Resident Of Federally Recognized Tribal Land  |
| <input type="checkbox"/> National School Lunch Free Lunch Program (NSLP)         |  |
| <input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP)      |  |
| <input type="checkbox"/> Temporary Assistance to Needy Families Program (TANF)   |  |

## CERTIFICATION SIGNATURE (PLEASE READ AND SIGN BELOW)

3. Read, Sign & Date

I understand that I must meet the above requirements to receive Lifeline or Link-up benefits and will notify my local telephone company when I am no longer participating in any of the above-designated program(s). I understand that I may only receive Link-up benefits for one line at my principal residence. I consent to the release of my personal information as may be required for the administration of the Lifeline or Link-up programs. I designate my local telephone company as my agent for purposes of changing my PIC-LPIC. I understand that any service or billing issues can be resolved by calling customer service. 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 understand that I am required to make my first payment 30 days after installation date to continue my next month of service or service will be disconnected. I have read and understand the privacy notice and option election contained on the back side of this form. Long distance usage for 1-411, party lines, chat lines, data transfer including internet or calls outside the contiguous 48 states will result in loss of Long Distance privileges.

Have you or another member of your household previously recieved Linkup assistance at the above address. YES or NO (circle one)

Currently I DO NOT received monthly Lifeline assistance through another telephone company. YES or NO (circle one)

(Note: You may not received Link Up assistance more than once at the same principal residence)

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT. BY SIGNING THIS FORM I ALSO CONSENT TO THE DISCLOSURE OF MY PERSONAL INFORMATION AS STATED ON THE BACK SIDE OF THIS FORM.

Signature

Date

Date of Birth (dd/mm/yy)

## FOR APPLICANT'S AUTHORIZED REPRESENTATIVE USE

I am an Authorized Representative for this applicant and I am submitting this form on behalf of this applicant. I am willing to assist this applicant in seeking telephone service benefits.

Authorized of Representative Name (Please Print)

Date

## THREE EASY WAYS TO SEND US COMPLETED FORM

**1** FAX TOLL FREE:  
**(877) 813-9614**

**2** eMAIL:  
lifeline@lifeconnex.net

**3** US MAIL:  
LIFE CONNEX TELECOM, LLC  
DEPT # 0626  
P.O. BOX 850001  
ORLANDO, FL 32885-0626

## Privacy Notice/Opt-in Election

Please contact Customer Service at the number listed on the front of this form with any questions or comments about this Privacy Notice and Opt-in Election.

**Overview:** Your Telephone Company respects your privacy. The Privacy Notice below details the measures taken by Your Telephone Company to protect your privacy in connection with your Re-Certification Lifeline/Link-up Application. Your Telephone Company provides this Privacy Notice to help you make an informed decision about whether to use or continue using Your Telephone Company's Services. Your use of Your Telephone Company's Services and any personal information you provide to Your Telephone Company remains subject to the terms of this Privacy Notice and Consent. If you do not agree to the terms of this privacy policy and do not wish to consent to the disclosure of your personally identifiable information ("PII"), please do not provide Your Telephone Company with any information and do not use Your Telephone Company's Services. Your use after the privacy policy has been modified will signify your acceptance of the changes for information gathered after the date of the change. This Privacy Notice discloses our privacy practices including the notification of: (i) PII collected through our Services; (ii) Intended Usage of this PII; (iii) The circumstances under which we disclose PII; (iv) Choices available regarding opt-in/opt-out, data collection, use and distribution of the information; (v) Security measures to protect the loss or misuse of information under Your Telephone Company's control; (vi) How to maintain the accuracy of your information.

### Information We Collect

- You provide certain personally identifiable information (such as your name, contact information, other PII and other information volunteered by you) to Your Telephone Company when applying for Lifeline/Link-up benefits. • If you submit personally identifiable information to us through the Your Telephone Company Services, then we use your personal information to operate, maintain, and provide to you the features and functionality of the Your Telephone Company. Your Telephone Company may combine information about you that we have with information we obtain from business associates or otherwise. Without limitation, information collected, including PII, may be used by Your Telephone Company for internal research purposes, marketing, promotions and public relations, subject only to the terms of our privacy policy.

- Your Telephone Company will not disclose, transfer, sell or otherwise communicate your PII to any third party, other than Your Telephone Company's subsidiaries and affiliates, and each of (i) their employees or (ii) vendors and contractors operating under confidentiality agreements and subject to Your Telephone Company's privacy policy, unless you give Your Telephone Company permission to do so, except as set forth in this privacy policy.

### When We Disclose Information

- We provide personally identifiable information and non-personally-identifiable information to our subsidiaries, affiliated companies, or other businesses or persons for the purpose of processing such information on our behalf. We require that these parties agree to process such information in compliance with our privacy policy, and we use reasonable efforts to limit their use of such information and to use other appropriate confidentiality and security measures.

- We do not share your personally identifiable information (such as name or email address) with other, third-party companies for their commercial or marketing use without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. **By signing this Application you are expressly opting-in (consenting) to permit Your Telephone Company to disclose you PII to companies that perform marketing services for us or to other partners who with which we have joint marketing agreements, such as to offer you additional product or services.** We may make such disclosures about you as a consumer, customer or former customer. Your Telephone Company may consider requests from unrelated third parties to contact you, but we will not give that third party any PII unless Your Telephone Company has obtained your consent. You must notify Your Telephone Company in writing if you wish to withdraw this consent. In addition, your request not to share Third Party Data with our Affiliate(s) does not prohibit us from contacting you about additional products or services.

- We may release personally identifiable information and/or non-personally-identifiable information if required to do so by law, or in the good-faith belief that such action is necessary to comply with state and federal laws (such as U.S. Copyright Law) or respond to a court order, subpoena, or search warrant ("Mandatory Disclosures").

- Your Telephone Company also reserves the right to disclose personally identifiable information and/or non-personally-identifiable information that Your Telephone Company believes, in good faith to take precautions against liability, to investigate and defend itself against any third-party claims or allegations, to assist government enforcement agencies, to protect the security or integrity of our company, and to protect the rights, property, or personal safety of Your Telephone Company, or others ("Mandatory Disclosures").

- As we develop our business, we may buy or sell assets or change our name or form of entity, and, depending upon the transaction, your personal information may be one of the transferred assets; provided, however, we will not sell or transfer PII except subject to the terms of our privacy policy. For instance, in the event that Your Telephone Company is acquired by another company, your PII may be part of the assets transferred to the acquiring party. The collected information may be provided in the aggregate to third parties, including potential business partners and advertisers, but this information is not linked to any PII before it is disclosed unless Your Telephone Company has obtained your consent. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

**Changes and Updates to This Privacy Notice:** Please understand that our privacy policy may change from time to time and this will be reflected by the "effective date" below. If we decide to make any material changes, we will post these changes Your Telephone Company. In general, we only use your personal information in the manner described in the Privacy Notice in effect when we received the personal information you provided. Your continued use of the Your Telephone Company Services constitutes your agreement to this Privacy Notice and any future revisions. For revisions to this Privacy Notice that may be materially less restrictive on our use or disclosure of the personal information you have already provided to us, we will attempt to obtain your consent before implementing such revisions with respect to such information.

**Effective Date:** This privacy policy is effective as of January 1, 2010.