



KRISTOPHER E. TWOMEY  
TELECOM/INTERNET LAW ■ REGULATORY CONSULTING

November 2, 2009

Via FedEx

filed electronically in docket office on 11/02/09

David Foster  
Utilities Division Deputy Chief  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Data Request No. 1 in the Application of Peace Communications, LLC for a  
Certificate to Provide Competing Local Telecommunications Services,  
Docket No. 09-00149

Dear Mr. Foster:

Enclosed for filing are an original and four (4) copies in response to the data request dated October 22, 2009. An electronic copy of the response has been delivered via e-mail to Sharla Dillon.

Please contact me at 202.250.3413 should you have any questions or need additional information or contact my assistant, Carol Lisowski at 510.285.8011, [carol@lokt.net](mailto:carol@lokt.net).

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristopher E. Twomey'.

Kristopher E. Twomey  
Counsel to Peace Communications, LLC

Enclosures

cc: Bill Chapman

1. Will Peace Communications, LLC offer residential service in Tennessee? If so will the company provide white page directory listings, access to 911 emergency services, free blocking for 900/976 calls, access to the telecommunications relay service, Lifeline and Link-Up and educational discounts existing on June 6, 1995?

Response: Peace Communications, LLC will not offer residential service in Tennessee.

2. Provide proof of authority to transact business in Tennessee issued by the Tennessee Secretary of State. The application contained a copy of the certificate registration with the Tennessee Department of Revenue, but not the Secretary of State.

Response: See Attachment A-1.

3. Provide a sworn statement from an authorized representative of the company that all applicable state and federal laws and TRA rules will be adhered to.

Response: See Attachment B-1.

4. The Application states that Peace Communications “enjoys significant access to capital” in regard to service offerings in Tennessee. Provide specific information and verification regarding the source of this potential funding.

Response: See Attachment C-1 for additional funds verification.

5. Several of the biographies of management and directors provided in Exhibit 3 appear to be for officers of VPNtranet, not Peace Communications, LLC. Please clarify whether these individuals are officers of Peace Communications, LLC or VPNtranet.

Response: James Peace is the CEO of Peace Communications, LLC. Although originally coming to the company from VPNtranet, Joe Freeman, Bill Chapman, and Jennifer Morrison are now serving Peace Communications under the titles listed in their biographies. Steve Blankenship recently joined Peace Communications as Chief Financial Officer. Dean Poi, one of the shareholders of VPNtranet, will act as a consultant for Peace Communications, LLC. All sales, engineering and executive customer support personnel are employees of Peace Communications only. Personnel from VPNtranet will provide network operations and back-office support and are shown as an expense line item on the filed pro-forma P&L.

6. The pre-filed testimony indicates that Mr. James Peace started VPNtranet, LLC in 2000, yet states that he has been “with Peace Communications/ VPNtranet since its inception in 2009.” Explain the relationship between Peace Communications, LLC and VPNtranet. Clarify when VPNtranet was created.

Response: James Peace is the CEO of Peace Communications and an officer of the LLC. He is also a major shareholder in VPNtranet. Carmen Peace is the 100% owner of Peace Communications.

VPNtranet was created in November 2000 to offer Internet Services and network support and will continue offering these products.

Carmen and James Peace realized a need to provide local competitive service to end users in Tennessee and decided to create a CLEC. Mr. Peace assumed leadership of Peace Communications, LLC as its CEO. Along with talented personnel previously with VPNtranet, Peace hopes to become a successful CLEC provider offering services to business customers. Network operations and back-office support will be provided by personnel from VPNtranet. The cost of these services are shown as an expense line item on the filed pro-forma P&L. Both of these companies will continue to exist on an individual basis.

7. Will Peace Communications, LLC rely on VPNtranet for funding? If so, provide current financial information for VPNtranet, including Balance Sheet, Income Statement and Statement of Cash Flows.

Response: Peace Communications, LLC will not rely on VPNtranet for funding.

Response to October 22, 2009 Data Request

I, Kristopher Twomey, do hereby swear that the following incumbent local exchange carriers have been notified of the Application of CommPartners, LLC for a Certificate to Provide Competing Local Telecommunications Services, Docket No. 09-00149 on this day November 2, 2009.



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Kristopher E. Twomey

Ardmore Telephone Company, Inc.  
BellSouth Telecommunications, Inc.  
CenturyTel of Adamsville  
CenturyTel of Claiborne, Inc.  
Century Telephone of Ooltewah-Collegedale, Inc.  
Frontier Communications of the Volunteer State  
Concord Telephone Exchange (TDS Telecom)  
Crockett Telephone Company, Inc.  
Humphrey's County Telephone Co.  
Loretto Telephone Company, Inc.  
Millington Telephone Company, Inc.  
Peoples Telephone Company, Inc.  
Embarq Communications, Inc.  
Tellico Telephone Company (TDS Telecom)  
Tennessee Telephone Company (TDS Telecom)  
United Telephone Company  
West Tennessee Telephone Company (TEC)

ATTACHMENT A-1



**STATE OF TENNESSEE**  
**Tre Hargett, Secretary of State**  
Division of Business Services  
312 Rosa L. Parks Avenue  
6th Floor, William R. Snodgrass Tower  
Nashville, TN 37243

**PEACE COMMUNICATIONS LLC**  
1100 CENTRAL AVE  
CHATTANOOGA, TN 37403 USA

October 29, 2009

### Filing Acknowledgment

Please review the filing information below and notify our office immediately of any discrepancies.

<b>Control # :</b>	<b>607820</b>	<b>Formation Locale:</b>	Hamilton County
<b>Filing Type:</b>	Limited Liability Company - Domestic	<b>Date Formed:</b>	08/07/2009
<b>Filing Date:</b>	08/07/2009 1:24 PM	<b>Fiscal Year Close</b>	12
<b>Status:</b>	Active	<b>Annual Rpt Due:</b>	04/01/2010
<b>Duration Term:</b>	Perpetual	<b>Image # :</b>	6577-0972
<b>Managed By:</b>	Director Managed		

#### Document Receipt

Receipt # :

Filing Fee:

**Registered Agent Address**  
JAMES PEACE  
1100 CENTRAL AVE  
CHATTANOOGA, TN 37403 USA

**Mailing Address**  
JAMES PEACE  
PO BOX 909  
CHATTANOOGA, TN 37401 0 USA

Congratulations on the successful filing of your **Articles of Organization** for **PEACE COMMUNICATIONS LLC** in the State of Tennessee which is effective on the date shown above. You must also file this document in the office of the Register of Deeds in the county where the entity has its principal office if such principal office is in Tennessee.

You must file an Annual Report with this office on or before the Annual Report Due Date noted above and maintain a Registered Office and Registered Agent. Failure to do so will subject the business to Administrative Dissolution/Revocation.

Tre Hargett, Secretary of State  
Business Services Division

ATTACHMENT B-1

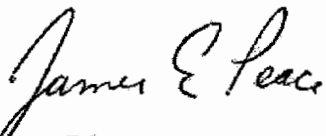
# PEACE COMMUNICATIONS, LLC

1100 EAST 11<sup>TH</sup> ST, CHATTANOOGA, TN 37403

Mr. David Foster  
Tennessee Regulatory Authority  
Utilities Division Deputy Chief  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Dear Mr. Foster,

This is to certify that Peace Communications, LLC will adhere to all applicable state and federal laws as well as all TRA rules.



James E Peace  
Chief Executive Officer  
Peace Communications, LLC



*Mitzi H. Beall*  
my commission expires:  
November 10, 2012

ATTACHMENT C-1