

# TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

October 26, 2010

Stanley Q. Smith  
Watkins Ludlam Winter & Stennis, PA  
190 E. Capitol Street, Suite 800  
Jackson, Mississippi 39201

RE: In the Matter of the Application of dPi Teleconnect, LLC for Designation as an  
Eligible Telecommunications Carrier (ETC),  
Docket No. 10-00147

Dear Mr. Smith:

After review of dPi Teleconnect, LLC's ("dPi") September 30, 2010, responses to Data Request No. 1 dated September 8, 2010, the following additional information or clarification is required.

**Question 1:** List the Tennessee exchanges in which dPi is currently and/or will be providing facilities based services using its own facilities and/or a combination of resale and UNE's. Additionally, list the rate centers where service is being provided through resale only.

**dPi's Response:** dPi Teleconnect, LLC has an approved interconnection agreement with AT&T Tennessee (Docket No. 10-0002, Order dated March 1, 2010) pursuant to which dPi utilizes unbundle network elements or their functional equivalent ("UNEs") from AT&T Tennessee. dPi will offer services via combination of resold services and its own facilities (obtained as UNEs) pursuant to the interconnection agreement with AT&T Tennessee. Please see the attached schedule of current active customers and rate centers in Tennessee serviced under agreements with Sprint and AT&T. dPi anticipates activating additional UNE lines in these rate centers upon being designated as as ETC in Tennessee.

**The list provided by dPi in its September 30, 2010 response does not provide a response to Question 1. In addition to the list NPA-NXXs by rate center, dPi needs to indicate the number of lines served and indentify which lines are served by dPi's own facilities (UNEs) or by resale.**

**Additionally, in regard to network elements and/or combinations discussed in dPi's petition at paragraph 9&10, provide the following information:**

- USOC of each unbundled network element obtained from the ILEC.**
- Cost of each network element obtained from the ILEC as provided above.**
- Plain language name of each network element obtained from the ILEC listed.**
- Service for which each network element listed is needed for provisioning.**
- Rate center/Exchange service area from which each network element listed is provisioned.**

**Describe, providing specific details, dPi's connectivity to the PSTN through/by way of the ILEC, or other Tennessee authorized Telecommunications Provider.**

**Question 2:** dPi Teleconnect has provided copies of its advertisements; however, dPi Teleconnect is requested to provide copies of specific advertisements for Lifeline services, showing the prices for services and for connection and describing the means used for distribution of the provided advertisements.

**dPi's Response:** To be supplied upon being designated as an ETC in Tennessee.

**In accordance with TRA rules Lifeline is a required service offering; therefore, provide copies and /or other information detailing the advertisement of its Lifeline and Link Up services offerings as specified in dPi's Tariff at 4.1.1 C and 5.1.1C. Include dPi's plans for the distribution of this advertisement demonstrating that the information will reach those most likely to qualify for the service.**

**Question 5:** Describe what benefits and/or enhanced services Tennessee consumers may realize by subscribing to dPi Teleconnect, LLC which are not already currently provided by ILECs and/or other Competitive companies.

dPi's Response discussed its service as another alternative and as a competitive choice for low income consumers.

**Describe specific benefits and the enhanced and unique services that dPi will provide which are not currently available to consumers in Tennessee by the ILEC and /or other competitive companies.**

**Question 6:** Describe dPi Teleconnect's measures in place to preventing those Lifeline customers served via resale of another carrier's services dPi from receiving the federal universal service Lifeline credit from the serving company and filing for credit with the Universal Administration Company.

**dPi's Response:** Prior to filing for any credits with the Universal Service Administration Company dPi Teleconnect employs a third party service provider to validate that none of the credits being applied for also have a corresponding federal universal Lifeline credit with the underlying carrier. This is accomplished by analyzing carrier invoices for specific customer and Lifeline credit information.

**In addition to the process describe above, provide the company name and contact information for dPi's third party vendor contracted to handle reporting to the Universal Service Administration Company with appropriate examples of documents and/or reports generated by that company.**

**Question 7:** If switching is obtained from another carrier by lease, what are dPi Teleconnect's transition plans for facilities-based switching, if any?

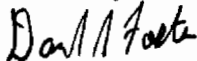
**dPi's Response:** Currently dPi Teleconnect has no immediate plans to transition to facilities-based switching for the provision of wireline services in the State of Tennessee. However, dPi is in the process of exploring various facilities-based solutions which may be utilized in its headquarter State of Texas and possibly other States. Should these plans materialize, dPi commits to update the TRA with respect to any facilities-base switching to be provision in the State of Tennessee.

**Describe, providing full technical detail, company's current as well as planned service provisioning in Tennessee compared to the service provisioning processes utilized in other states such as North Carolina. The provided description should fully explain all aspects of the services provided.**

**Provide in detail, the method dPi uses to obtain Tennessee telephone numbers for assignment to end user subscribers.**

This information should be provided no later than 2:00 p.m. on November 8, 2010 with reference to Docket No. 10-00147 on the response. In accordance with Authority rules submit either (1) thirteen written copies of your response or (2) four written copies and an electronic version. Should you have any questions regarding this request, please contact Helen Trimble-Anthony ext 174.

Sincerely,

A handwritten signature in black ink, appearing to read "David Foster", written in a cursive style.

David Foster, Chief  
Utilities Division