

Lance J.M. Steinhart, P.C.

1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone:(770) 232-9200

Facsimile:(770) 232-9208

Email: lsteinhart@telecomcounsel.com

June 20, 2011

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

Mr. David Foster
Utility Division Deputy Chief
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
(615) 741-3939

filed electronically in docket office on
06/20/11

Re: Docket No. 10-00187, Application for Aegis Telecom, Inc. d/b/a Off the Hook Telecom for Certificate of Public Convenience and Necessity to Provide Competing Local Exchange and Interexchange Telecommunication Services in Tennessee

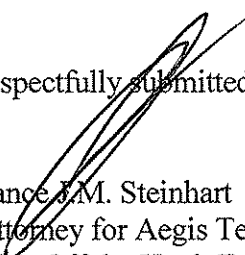
Dear Mr. Foster:

Enclosed please find for filing an original and four (4) copies of the Data Request No. 4 for Aegis Telecom, Inc. d/b/a Off the Hook Telecom. This filing has also been sent via e-mail to sharla.dillon@state.tn.us on June 20, 2011.

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 Aegis Telecom, Inc.
d/b/a Off the Hook Telecom

Enclosures: Robert Clark

Question No. 1 Attached is a copy of a notarized statement from Ms. Naomi Rodriguez alleging, among other things, that Telecom Service Bureau (the third party firm that will provide management services for Aegis Telecom, Inc.) is supplying phones to individuals who do not meet the eligibility requirements for Lifeline and Link Up services. Please respond to this statement.

Response: **We are aware of the allegations made by Ms. Naomi Rodriguez against Telecom Service Bureau. These allegations were made against another entity that utilizes Telecom Service Bureau for back office operations. We have had several discussions with senior executives at Telecom Service Bureau and remain confident in the procedures and processes they have established. In addition, attached is a publicly available response provided to the Missouri Commission in response to the specific allegations made by Ms. Rodriguez. We remain committed to Telecom Service Bureau and believe they have been very open and forthright in responding to these allegations.**

Question No. 2 What procedures are in place within Aegis Telecom, Inc. to assure that all Lifeline and Link Up customers meet the eligibility requirements for those programs?

Response: **Per established Tennessee rules Aegis will receive a signed certification form where each end user self-certifies their enrollment in one of the pre-approved programs established by the state commission.**

Question No. 3 What procedures are in place within Aegis Telecom, Inc. to ascertain that Telecom Service Bureau will comply with state and federal requirements for Lifeline and Link Up programs?

Response: **Aegis Telecom has contracted with CGM, LLC a Roswell, Georgia-based telecommunications service bureau that provides lifeline compliance support, strategic planning support, and 497 management services. CGM's unique compliance editing technology audits monthly reimbursement request data for the following:**

- a. Double-Dip Edit: Each month, prior to calculating the total of subsidy reimbursements to be requested via the federal 497 form, CGM's systems compare the list of subsidies-given by Aegis to the detail of Aegis's underlying carrier invoice. This edit identifies any/all lines for which Aegis has received a lifeline discount/subsidy from the underlying carrier. All such lines are then edited out of the file that will be used to complete the federal 497 form. This edit insures that Aegis will never request a subsidy for the same line, in the same month, from both an underlying carrier and USAC.**
- b. Same-Month Lifeline Edit: CGM's systems also edit for duplicate lifeline subsidies given to the same address in a single month, across an ETC's entire platform (wire line and wireless). This ensures that an ETC will never request two lifeline subsidies for the same address in the same month.**
- c. Duplicate Historical Link-up Edit: CGM builds a unique data base for each of its client. The Aegis data base contains the name and address details of every LINK-up subsidy that Aegis has ever requested from USAC. All current-month Link-up reimbursement candidate data is processed through this database prior to inclusion on a federal 497 form. Any historical duplicates are edited out. This ensures that Aegis will only provide a single Link-up subsidy to a name/address, ever.**
- d. Active Line Edit: Each month, CGM confirms that all lines for which federal reimbursement is to be requested, are active lines on the carrier's/underlying carrier's network. As such, Aegis will never request reimbursement for lines that have been terminated in previous months.**