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July 18, 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

Re: In the Matter of the Absolute Home Phones Inc. Application for  
Designation of Eligible Telecommunications Carrier (ETC)  
Docket 10-00202

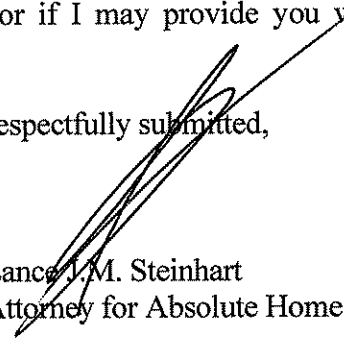
Dear Mr. Foster:

Enclosed please find for filing an original and four (4) copies of the Data Request No. 2 for Absolute Home Phones, Inc. This filing has been electronically submitted on July 18, 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 Absolute Home Phones, Inc.

Enclosures:  
Chris Peltier

Question No. 1. Identify by each rate center listed in Absolute's application, the number and type (residential or business) of lines currently being served and whether services are provided by resale or by leased UNEs.

**Response:** **Absolute Home Phones, Inc. does not currently have any customers, residential or business, in any rate center in Tennessee.**

Question No. 2. Identify and provide copies of Absolute's Advertisements including advertisements for Lifeline services, such as newsprint, fliers, posters etc., and provide plans detailing how and where the advertisements are distributed to Tennesseans, especially to those most likely to qualify for lifeline services.

**Response:** **Please see the attached advertisements. (Exhibit A)**

Question No. 3. Does Absolute offer services to customers other than Lifeline customers? As described on page 8 of your petition, please describe and list all service plans available and the associated rates. (Provide tariff reference as well)

**Response:** **Absolute offers service to Lifeline and Non-Lifeline customers alike. Please see the attached plans that are currently being offered in states other than Tennessee. The plans are also detailed in Absolute's Tariff Number 2, original pages 44 that was filed with their application for a certificate of Public Convenience and Necessity to Provide Local and Interexchange Telecommunications Services in Tennessee, which was approved October 7, 2010. Please see the attached. (Exhibit B)**

Question No. 4. Outline Absolute's plans for ensuring its customers continue receiving telecommunications services should AT&T-Tennessee relinquish a particular service area that results in Absolute assuming Carrier of Last Resort obligations referred to in paragraph 12 of the ETC Application. The designation obligation means that if the incumbent relinquishes a service area, or areas, either by negotiation between itself and another carrier, or by order of the Authority, another carrier must assume serving the customers in that area or those areas.

**Response:** Absolute understands the responsibility that it will assume as Carrier of Last Resort. In the unlikely event that AT&T no longer provides service in the designated service area, Absolute would most definitely enter into an agreement with the new Carrier that would purchase AT&T's assets, or with the competitive carrier that caused AT&T to abandon its service territory, and provide service as necessary to all customers who request it, not just current customers. The company would utilize UNEs from any successor carrier to AT&T.

Question No. 5. Describe what benefits and/or enhanced services Tennessee consumers may realize by subscribing to Absolute Home Phones, Inc. which are not already currently provide by ILECs and/or other Competitive companies.

**Response:** In our own research, over the past 14 years in which the lifeline program has been in place only 50% (408,756) of eligible households in the state of Tennessee are actually receiving the lifeline subsidy. Through its unique outreach methods and distribution channels, Absolute Home Phones, Inc. is positioned to reach the roughly 300 thousand plus eligible but unserved households in Tennessee.

Question No. 6. Provide Absolute's procedures that will prevent it from receiving the federal lifeline credit (from USAC) from a customer currently provided lifeline credits by another carrier. Also, please describe how these procedures are communicated to Absolute's sales personnel. If these procedures are in writing, please provide.

**Response:** Absolute be using a self certification form to verify a customer's eligibility. Dependent on the type of program the customer selects, proof of verification may be required. Once the customer is on our platform, the customer goes through several edits.

Absolute is contracted with CGM, LLC, a lifeline editing and data processing service bureau based in Roswell Georgia. The following edits are in place within CGM's systems to ensure Absolute is compliant.

- 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 Absolute to the detail of Absolute's underlying carrier invoice. This edit identifies any/all lines for which Absolute 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 Absolute 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 Absolute database contains the name and address details of every Linkup subsidy that Absolute has ever requested from USAC. All current-month Linkup 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 Absolute will only provide a single Linkup 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, Absolute will never request reimbursement for lines that have been terminated in previous months.

Question No. 7. Provide a copy of Absolute's Application to be used by Lifeline Applicants. Also describe the annual re-verification process for Lifeline customers.

**Response:** Each year, Absolute Home Phones, Inc. will perform its annual verification sampling a statistically valid sample, as described in the annual FCC Public Notice on Annual Certification/ Verification (Required per Public Notice DA 11-749). Each end user selected must re-certify under penalty of perjury that they continue to be eligible for the lifeline program. The end user must present proof/ documentation of their participation in one of the lifeline eligible programs. Once the results of the audit are finalized, they are forwarded to USAC by August 31<sup>st</sup>, as required, and will be forwarded to the state of Tennessee as well.  
Please see the attached application and certification form.  
(Exhibit C)

Question No. 8. Describe the process Absolute utilizes for ordering and establishing services for Lifeline applicants using facilities-based UNEs. Provide copies of the order form and support documentation. Identify by name and address all entities with which Absolute is affiliated, shares common ownership, or operates under a pseudo or assumed name, including but not limited to any parent, subsidiary, affiliated or associate, sister, or holding company, and d/b/a or f/k/a designations.

**Please see the attached application (Exhibit C)**

**Once an order has been taken by one of Absolute Home Phones, Inc.'s agents/ representatives, it is placed into Absolute Home Phones, Inc. ordering template using the Overgroup system. This system then produces an LSR inside of AT&T ordering system creating the order using the following USOCs on the UNE-P Platform.**

Type	Code
Feature Code	UEPLX
Feature Code	UEPVF
Feature Block	CREXA
LPIC	NONE
Line Class	UEPRC
PIC	NONE
Block	AH

**Typically, within 48 hours Absolute Home Phones, Inc. receives a FOC date from AT&T's system telling Absolute Home Phones, Inc. the order has been complete. Please see attached LWC contract (Exhibit D)**

**Absolute Home Phones, Inc. is not affiliated, nor do they share common ownership, nor do they operate under a pseudo or assumed name, including but not limited to any parent, subsidiary, affiliated or associate, sister, or holding company. They do go by the name Absolute Home Phones, Inc d/b/a Absolute Mobile in Arkansas.**

**Exhibit A**

**Advertising Plan**

**Examples of Advertising**

**Absolute Mobile**  
**Marketing & Advertising Plans/Ideas for**  
**Tennessee Lifeline Services**

**Direct Mail**

- Perforated Postcards with Lifeline Form & Bus. Reply
  - 25,000 cards mailed weekly
- Mail South
  - Monthly mailings
- Valassis
  - Monthly mailings

**TV – Fox Stations Daytime Programming & Saturday Evening Animation**

Station	Area Served
• WDSI-Fox TV	Chattanooga
• WJKT-Fox TV	Jackson
• WEMT-Fox TV	Johnson City, Kingsport, Bristol
• WTNZ-Fox TV	Knoxville
• WHBQ-Fox TV	Memphis
• WZTV-Fox TV	Nashville

**Government Agencies**

(Provide countertop display boxes with pre-addressed, postage paid Lifeline forms)

- American Red Cross of NE Tennessee
- Appalachian Outreach Food Pantry
- Bedford County Health Department (WIC)
- Bradley/Cleveland Community Services
- And more

**Live Events held in specific locations on a monthly basis**

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**CAN YOUR  
LOVED ONES  
CALL YOU  
WHEN YOU'RE  
NEEDED?**

**Call or visit us online:  
855-570-8637**

**[www.absolutemobilephones.com](http://www.absolutemobilephones.com)**

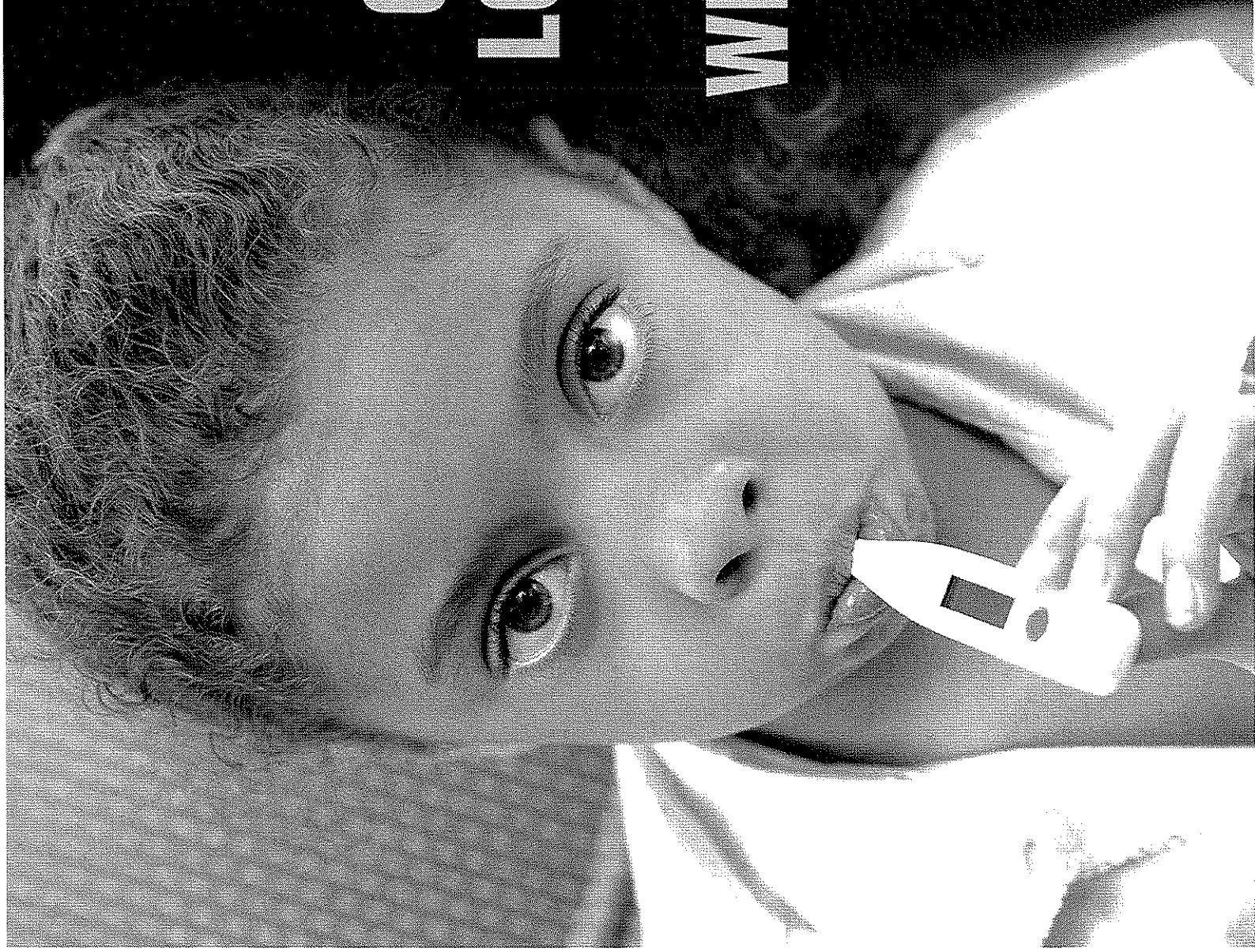
**YOU'RE QUALIFIED if you receive:**

Medicaid, as provided under TennCare; Food Stamps (SNAP); Supplemental Security Income (SSI); Federal Public Housing / Section 8; Temporary Assistance to Needy Families (TANF); Low Income Home Energy Assistance Plan (LIHEAP); National School Lunch Program (NSL)



**100 FREE MINUTES MONTHLY**  
Extra Plans available :  
35 Minutes @ \$5.00  
75 Minutes @ \$10.00  
100 Minutes @ \$13.50  
160 Minutes @ \$20.00  
270 Minutes @ \$30.00  
700 Minutes @ \$50.00

**CAN YOUR  
LOVED ONES  
CALL YOU  
WHEN YOU'RE  
NEEDED?**



**CARING MOTHERS DESERVE TO BE REACHED,  
ABSOLUTE MOBILE IS HERE FOR YOU.**

*Being there when you're needed is a necessity  
and Absolute Mobile offers government assistance.*

## **YOU QUALIFY**

*if you receive:*

- Medicaid, as provided under TennCare
- Food Stamps (SNAP)
- Supplemental Security Income (SSI)
- Temp. Assist. to Needy Families (TANF)
- National School Lunch Program (NSL)
- Federal Public Housing / Section 8
- Low Income Home Energy Assist.  
Program (LIHEAP)



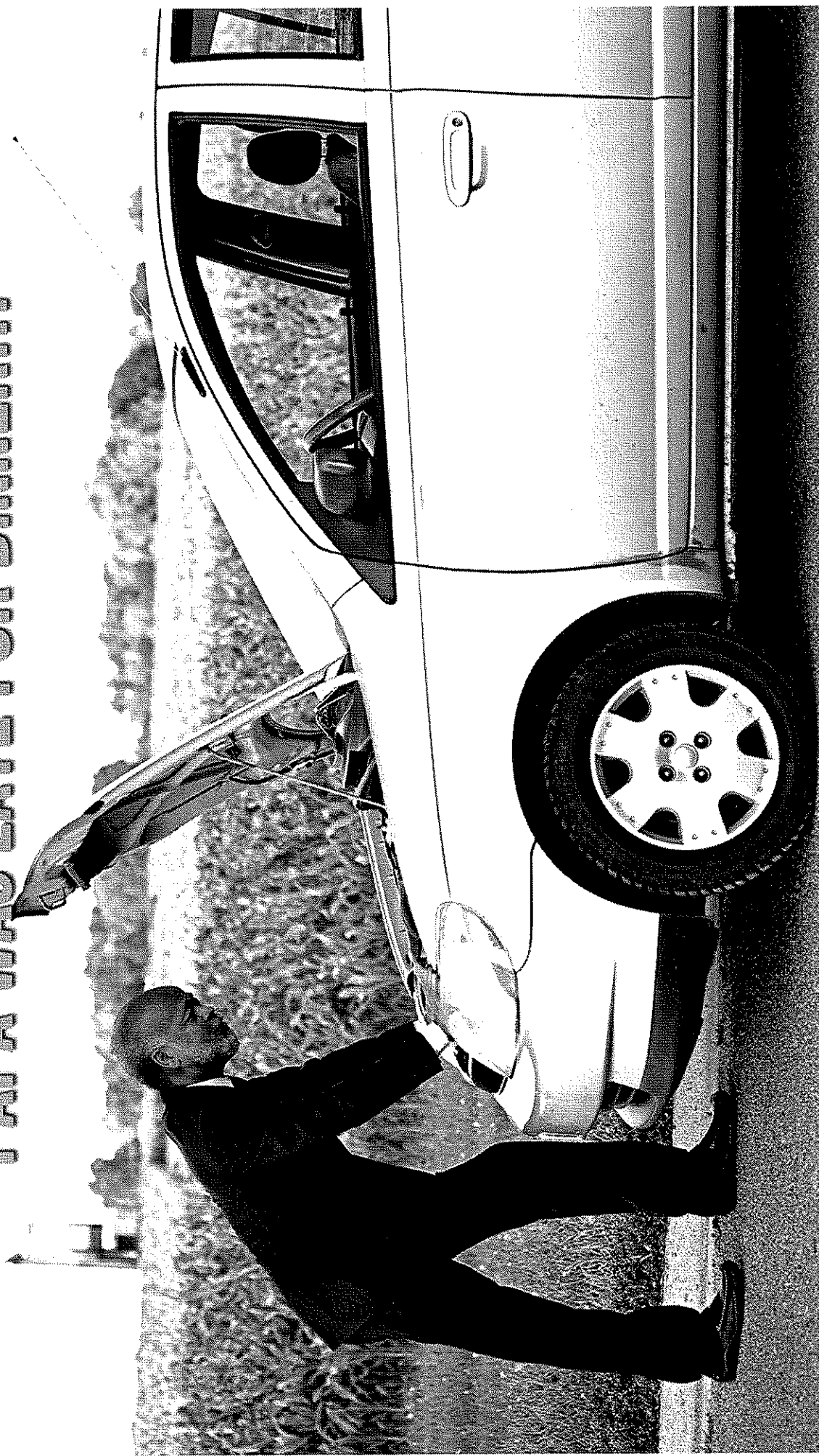
# **ABSOLUTE** MOBILE

**855-570-8637**  
[www.absolutemobilephones.com](http://www.absolutemobilephones.com)

Extra Plans available :  
35 Minutes @ \$5.00  
75 Minutes @ \$10.00  
100 Minutes @ \$13.50  
160 Minutes @ \$20.00  
270 Minutes @ \$30.00  
700 Minutes @ \$50.00



**WE KNEW SOMETHING WAS WRONG WHEN  
PAPA WAS LATE FOR DINNER...**



**WE ALL WERE RELIEVED**

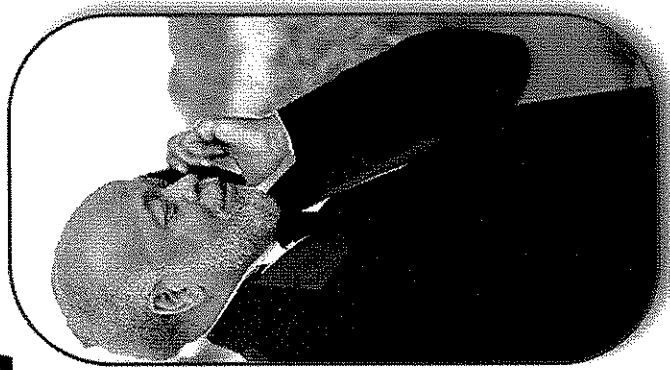
**WHEN HE CALLED ON HIS CELL PHONE.**

*Calling for help when you're stranded is a necessity  
and Absolute Mobile offers government assistance.*

## **YOU QUALIFY**

*if you receive:*

- Medicaid, as provided under TennCare
- Food Stamps (SNAP)
- Supplemental Security Income (SSI)
- Temp. Assist. to Needy Families (TANF)
- National School Lunch Program (NSL)
- Federal Public Housing / Section 8
- Low Income Home Energy Assist.  
Program (LIHEAP)



# **ABSOLUTE** MOBILE

**855-570-8637**

[www.absolutemobilephones.com](http://www.absolutemobilephones.com)

Extra Plans available :

35 Minutes	@	\$5.00
75 Minutes	@	\$10.00
100 Minutes	@	\$13.50
160 Minutes	@	\$20.00
270 Minutes	@	\$30.00
700 Minutes	@	\$50.00

# The best things in life are **free!**

## Get your **free** wireless phone

**Includes:**

- A **Free** Cell Phone with Caller ID,  
Call Waiting & Voicemail
- **100 Free** Rollover Minutes
- **No** Deposit &  
**No** Credit Check

**Call Now!**  
**855.570.8637**

**ABSOLUTE**  
MOBILE





**YOU QUALIFY** for the  
**FREE** service if you receive:

- Medicaid, as provided under TennCare
- Food Stamps (SNAP)
- Supplemental Security Income (SSI)
- Temp. Assist. to Needy Families (TANF)
- National School Lunch Program (NSL)
- Federal Public Housing / Section 8
- Low Income Home Energy Assist.  
Program (LIHEAP)

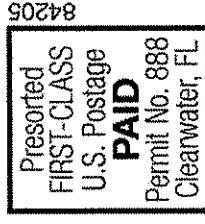
**LIMITED TIME OFFER**

Call or Visit Us Online

**855.570.8637**

[www.absolutemobilephones.com](http://www.absolutemobilephones.com)

Mr. & Mrs. John A. Smith  
456 Orange Grove Blvd.  
Orlando, FL 32806



84205

## **Exhibit B**

### **Rate Plans**





☐ **Lifeline Premier Package** Best Option!  
**\$25.00 per month + taxes & surcharges**  
 (\$38.50 Base Price - \$13.50 Lifeline Discount)  
**Activation Fee: Free**  
 (\$60 Activation Fee - \$30 Linkup Discount - \$30  
 Promotional Discount = Free!)

Unlimited Long Distance for the first month  
 60 minutes free Long Distance each month  
 Call Waiting  
 Caller ID / Caller ID with Name

#### Non Lifeline Services

\*\*\*All plans have a \$60 Activation Fee\*\*\*

☐ Basic Local Service **\$36.50 + tax**  
 60 minutes free long distance per month

☐ Premier Package Service **\$38.50 + tax**  
 60 minutes free long distance per month  
 Includes Caller ID & Call Waiting

☐ Complete Package Service **\$48.50 + tax**  
 60 minutes free long distance per month  
 Includes Caller ID, Call Waiting, Return Call, Call Forwarding, and more!

#### A' La Carte Custom Calling Features Available

☐ Three Way Calling  
☐ Call Return  
☐ Unpublished Number

☐ No Long Distance  
☐ No Toll Control/No Toll Blocks

#### Internet Service

☐ Tier 1  
☐ Tier 2  
☐ Tier 3

#### Pre Paid Long Distance Services

☐ 120 minutes  
☐ 500 minutes  
☐ 1000 minutes  
☐ Unlimited Long Distance

#### Toll Options:

State	Toll Limitation Services MRC	Toll Limitation Services NRC	Toll Block MRC	Toll Block NRC	State	Toll Limitation Services MRC	Toll Limitation Services NRC	Toll Block MRC	Toll Block NRC
AL	\$2.99	\$3.49	\$3.22	\$0.00	MS	\$2.99	\$3.49	\$5.06	\$0.00
FL	\$2.99	\$3.49	\$4.69	\$7.82	NC	\$2.99	\$3.49	\$0.00	\$7.65
GA	\$2.99	\$3.49	\$4.92	\$7.97	SC	\$2.99	\$3.49	\$5.12	\$8.52
KY	\$2.99	\$3.49	\$4.99	\$0.00	TN	\$2.99	\$3.49	\$4.20	\$0.00
LA	\$2.99	\$3.49	\$4.76	\$0.00					

#### Customer Information (print clearly)

☐ New ☐ Convert your current service

Date \_\_\_\_\_

Last Name \_\_\_\_\_ First Name \_\_\_\_\_ Middle Init. \_\_\_\_\_

Address \_\_\_\_\_ Apt # \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Last 4 Digits of SSN: \_\_\_\_\_

Current Home Phone Number (\_\_\_\_\_) \_\_\_\_\_ (if applicable)

Contact Phone Number (\_\_\_\_\_) \_\_\_\_\_ (required)

All payments should be by Credit Card or Money Order. No personal Checks accepted. All phone services added after sign up will be subject to a service fee. First month's service all fees are waived, all other months' service are plus taxes and FCC surcharges. Your second month's payment will be due 30 days after installation date. The total amount due will include all taxes and surcharges on the final balance. If payment is not received prior to the due date your account will incur a \$5 extension fee and possible interruption of phone service. If the service is interrupted for Non-Payment, an additional \$15 restore fee must be paid in order to restore phone service. Once service is suspended, final disconnection will occur after 7 days.

X \_\_\_\_\_

Applicant's Signature

Date

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**SECTION 4.0 SERVICE DESCRIPTIONS AND RATES (CONT'D)**

**4.1 Local Exchange Service (Cont'd)**

**4.1.3 Local Line Rates and Charges (Cont'd)**

Calling Plans (Monthly Recurring Charges)

A. Basic Package

Unlimited Local Calling

Monthly Charge:       \$36.50 (Non-Lifeline Customers)  
                                  \$23.00 (Lifeline Customers)

B. Complete Package

Unlimited Local Calling  
Caller ID w/ Name  
Call Waiting  
Call Waiting ID  
\*69  
Three Way Calling  
Call Forwarding

Monthly Charge:       \$48.50 (Non-Lifeline Customers)  
                                  \$35.00 (Lifeline Customers)

C. Premiere Package

Unlimited Local Calling  
Caller ID w/ Name  
Call Waiting  
Call Waiting ID

Monthly Charge:       \$38.50 (Non-Lifeline Customers)  
                                  \$25.00 (Lifeline Customers)

**Exhibit C**

**Customer Application / Self-Certification Form**



For Office Use Only

Customer Account Number

## Lifeline and Link-Up Self-Certification Form

Please Print Clearly (Red Indicates Required Fields)

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_ Apt# \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Current Home Number ( ) \_\_\_\_\_

Contact Phone Number ( ) \_\_\_\_\_

\_\_\_\_ New Service

\_\_\_\_ Conversion

I hereby certify that I participate in the following public assistance program(s):

\_\_\_\_ Medicaid

\_\_\_\_ Food Stamps (SNAP)

\_\_\_\_ Supplemental Security Income (SSI)

\_\_\_\_ National Free Lunch Program (free program only)

\_\_\_\_ Federal Public Housing (HUD/Section 8)

\_\_\_\_ Temporary Assistance to Needy Families (TANF)

\_\_\_\_ Low Income Home Energy Assistance Plan (LIHEAP)

If you are not the recipient of any of the above public assistance programs, please state your relationship to the household member receiving assistance: \_\_\_\_\_

Referred by: \_\_\_\_\_ Phone#: \_\_\_\_\_

I certify that I am a current recipient of the above programs(s) and will notify my local telephone company when I am no longer participating in any of the above-designated program(s). I give permission to the duly authorized official(s) administering the above programs to provide to the local telephone company my participation status in any of the above program(s). I give this permission on the condition that the information on this form and any information about my participation in the above programs provided by officials be maintained by the company as confidential customer account information. I am aware that pursuant to Section 837.06, F.S., whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty shall be guilty of a misdemeanor of the second degree.

X \_\_\_\_\_

**Applicant's Signature Date**

\_\_\_\_ I authorize Absolute Home Phones, Inc. to be my local and long distance carrier for the above listed telephone number. I also understand that I will be billed for my telephone service by Absolute Home Phones, Inc.

\_\_\_\_ I certify that I have received the link-up discount at this residence from another carrier and I am not eligible for the discount at this time.

**Absolute Home Phones, Inc.**

PO Box 831327

Ocala FL 34483-1327

Customer Service: 866-500-9976 · Fax: 877-430-2907

**Exhibit D**

**Local Wholesale Contract With AT&T**

Demetria Johnson-Jackson  
Manager – Interconnection Agreements

Four AT&T Plaza  
311 S. Akard, 9<sup>th</sup> Floor  
Dallas, TX 75202-5398



February 24, 2010

Chris Peltier  
President  
Absolute Home Phones, Inc.  
710 NE 48<sup>th</sup> Avenue Road  
Ocala, FL 34470

Dear Chris Peltier:

Enclosed, for your files, is a fully executed signature page for the 22-State Commercial Local Wholesale Complete Agreement between AT&T and your company.

If you have questions regarding the enclosed signature page, please contact Dwight Bailey on 352-438-2225.

Sincerely,

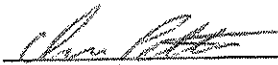
Demetria Johnson-Jackson  
Manager – Interconnection Agreements

Enclosure

Absolute Home Phones, Inc.

BellSouth Telecommunications, Inc. d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee, Illinois Bell Telephone Company d/b/a AT&T Illinois, Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana, Michigan Bell Telephone Company d/b/a AT&T Michigan, Nevada Bell Telephone Company d/b/a AT&T Nevada and AT&T Wholesale, The Ohio Bell Telephone Company d/b/a AT&T Ohio, Pacific Bell Telephone Company d/b/a AT&T California, The Southern New England Telephone Company d/b/a AT&T Connecticut, Southwestern Bell Telephone Company d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, AT&T Texas, Wisconsin Bell, Inc. d/b/a AT&T Wisconsin by AT&T Operations, Inc., its authorized agent

Signature: \_\_\_\_\_



Name: \_\_\_\_\_

Chris Peltier  
(Print or Type)

Title: \_\_\_\_\_

President  
(Print or Type)

Date: \_\_\_\_\_

1/15/10

Signature: \_\_\_\_\_



Name: \_\_\_\_\_

Eddie A. Reed, Jr.  
(Print or Type)

Title: \_\_\_\_\_

Director – Interconnection Agreements

Date: \_\_\_\_\_

2-4-10

ACNA - HPZ