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November 30, 2011

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

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

filed electronically in docket office on 11/30/11

Re: Tele Circuit Network Corporation (Tele Circuit)
Docket No. 11-00186

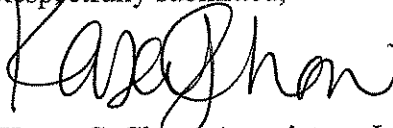
Dear Mr. Foster:

Enclosed please find for filing an original and four (4) copies of the responses to Data Request No. 1 for Tele Circuit. This filing has been electronically submitted on November 30, 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,



Kasey C. Chow, Associate to Lance J.M. Steinhart
Attorney for Tele Circuit Network Corporation

Enclosures
cc: Ashar Syed

TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway
Nashville, Tennessee 37243-0505

November 9, 2011

Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
Attorney for Applicant
1720 Windward Concourse, Suite 115
Alpharetta, GA 30005

RE: In the Matter of the Application of Tele Circuit Network Corporation (Tele Circuit)
for Designation as an Eligible Telecommunications Carrier (ETC),
Docket No. 11-00186

Dear Mr. Steinhart:

In order to assist the Authority in its review of the above reference docket, it is requested that the following be provided.

1. Identify and provide copies of Tele Circuits' advertisements including advertisements for Lifeline services, such as newsprint, television, trade magazines, fliers, posters etc., and provide details on how and where the advertisements are distributed to Tennesseans, especially to those most likely to qualify for lifeline services. (If not providing service in Tennessee, provide copies of advertisements utilized in other states and/or drawing board advertisements used in planning.)
2. Does Tele Circuit offer services to customers other than Lifeline customers? (Provide tariff reference as well)
3. List the states where Tele Circuit is providing, or has requested authority to provide, local exchange service and whether the company has applied for or has been designated as an ETC. Additionally, is Tele Circuit currently providing local exchange service in any state where it has not received ETC designation? If not, provide an explanation.
4. Describe the benefits and/or enhanced services Tennessee consumers will realize by subscribing to Tele Circuit which are not already currently provide by ILECs and/or other Competitive companies.

5. Describe, providing specific details, Tele Circuit's connectivity to the PSTN through/by way of the ILEC, or other Tennessee authorized Telecommunications Provider.
6. Describe Tele Circuit's measures in place to prevent those Lifeline customers served via resale of another carrier's services that Tele Circuit is not receiving the federal universal service Lifeline credit from the serving company and filing for credit with the Universal Administration Company.
7. If switching is obtained from another carrier by lease, describe Tele Circuit Marketing's transition plans for facilities-based switching, if any?
8. Provide a copy of Tele Circuit's Application to be used by Lifeline Applicants. Also describe the annual re-verification process for Lifeline customers.
9. Outline Tele Circuit's plans for ensuring its customers continue receiving telecommunications services should AT&T- Tennessee relinquish a particular service area that result Tele Circuit's assumption of the Carrier of Last Resort obligations referred to in paragraph 12 of the ETC Application.

This information should be provided no later than 2:00 p.m. on December 2, 2011 with reference to Docket No. 11-00186 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,



David Foster, Chief
Utilities Division

Question 1 Identify and provide copies of Tele Circuit's advertisements including advertisements for Lifeline services, such as newsprint, television, trade magazines, fliers, posters etc., and provide details on how and where the advertisements are distributed to Tennesseans, especially to those most likely to qualify for lifeline services. (If not providing service in Tennessee, provide copies of advertisements utilized in other states and/or drawing board advertisements used in planning.)

ANSWER: Please see copy of TV Script provided herewith as Exhibit A.

Tele Circuit will market to Lifeline customers through local television broadcasts. Television advertisements will be aired on daytime TV to reach those customers most likely to qualify for lifeline services.

Tele Circuit has identified the following stations to reach the target market: WBXX-TV in Knoxville, TN, WHBQ-TV in Memphis, TN, and WNAB-TV in Nashville, TN. Tele Circuit will run advertising from 9:00 am - 6:00 pm daily on the selected stations.

Question 2 Does Tele Circuit offer services to customers other than Lifeline customers? (Provide tariff reference as well.)

ANSWER: Yes. Tele Circuit offers local and long distance services to customers in Tennessee. Tele Circuit was authorized to provide such services on February 3, 2009 in Docket No. 08-00199.

Question 3 List the states where Tele Circuit is providing, or has requested authority to provide, local exchange service and whether the company has applied for or has been designated as an ETC. Additionally, is Tele Circuit currently providing local exchange service in any state where it has not received ETC designation? If not, provide an explanation.

ANSWER: Tele Circuit is authorized to provide local service in the following states: Alabama, Florida, Georgia, Louisiana, North Carolina, South Carolina, Tennessee, and Texas.

Tele Circuit has been designated as an ETC in Florida and has applied, or is in the process of applying, for ETC designation in Alabama, Arkansas, Georgia, North Carolina, South Carolina, and Tennessee. No such applications have been denied.

Tele Circuit is currently providing local service in the following states: Alabama, Florida, Georgia, North Carolina, South Carolina, Tennessee, and Texas. Tele Circuit has not received ETC designation in any of these states

except Florida; however, as mentioned above, Tele Circuit has applied, or is in the process of applying, for such ETC designation.

Question 4 Describe the benefits and/or enhanced services Tennessee consumers will realize by subscribing to Tele Circuit which are not already currently provided by ILECs and/or other Competitive companies.

ANSWER: Tele Circuit operates bi-lingual call centers available 6 days per week for customer convenience. Tele Circuit also offers multiple payment options for customers including local payment centers, live customer service representatives, automated payments by phone and by internet. Tele Circuit also offers customer payment arrangements targeting economically disadvantaged customers allowing partial payments and extended payment terms.

Question 5 Describe, providing specific details, Tele Circuit's connectivity to the PSTN through/by way of the ILEC, or other Tennessee authorized Telecommunications Provider.

ANSWER: Tele Circuit will connect to the PSTN through resale of AT&T facilities and through leased network elements obtained from AT&T.

Through its wholesale agreement with AT&T, Tele Circuit will offer Section 251 loops commingled with Section 271 elements (UNEs), as provided by federal law. Accordingly, when it orders under the agreement, Tele Circuit uses UNEs in its network and satisfies the requirement set forth in Section 241(e)(1)(a).

Question 6 Describe Tele Circuit's measures in place to prevent those Lifeline customers served via resale of another carrier's services that Tele Circuit is not receiving the federal universal service Lifeline credit from the serving company and filing for credit with the Universal Administration Company.

ANSWER: Tele Circuit has contracted with CGM, LLC of Roswell, GA, a Lifeline data processing bureau to edit all 497 forms for the following:
(1) Double-dipped Lifeline subsidy
(2) Duplicate Historical Link-Up
(3) Inactive Lines

With this automated screening process, Tele Circuit ensures that subsidies are requested only for qualified lines and customers.

Question 7 If switching is obtained from another carrier by lease, describe Tele Circuit's transition plans for facilities-based switching, if any?

ANSWER: Tele Circuit has no current plans for facilities-based switching.

Tele Circuit provides service to its end users through the leasing of switched port/loop combination UNE's (previously known as UNE-P) or through resale.

Question 8 Provide a copy of Tele Circuit's Application to be used by Lifeline Applicants. Also describe the annual re-verification process for Lifeline customers.

ANSWER: Please see a copy of Tele Circuit's Lifeline Application provided herewith as Exhibit B.

Section 54.416 of the FCC's Rules requires ETCs to certify a consumer's qualification for Link-Up, and Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Tele Circuit will certify and verify consumer eligibility in accordance with the FCC's requirements and with applicable Commission rules.

Tele Circuit's annual re-verification process is an automated system that provides company notification when a customer's annual re-verification is due. Tele Circuit then contacts the customer for the required documentation proof for re-verification. Customers are contacted to update certification via an automated system. If the customer does not respond, a customer service representative will make a live call.

Question 9 Outline Tele Circuit's plans for ensuring its customers continue receiving telecommunications services should AT&T – Tennessee relinquish a particular service area that result Tele Circuit's assumption of the Carrier of Last Resort obligations referred to in paragraph 12 of the ETC Application.

ANSWER: Tele Circuit is willing to accept carrier of last resort obligations throughout the universal service areas in which Tele Circuit is designated as an ETC by the Commission.

In the unlikely event that AT&T relinquishes a particular service area, Tele Circuit would aggressively seek an agreement with the new service provider to continue service with customers without interruption.

Tennessee Regulatory Authority
November 30, 2011
Docket No. 11-00186

LIST OF EXHIBITS

Exhibit A – TV Script

Exhibit B – Sample Lifeline Application

Revised 10/10/11
Visual

Graphic:

Do you receive
Government Assistance?

Roll the graphic:

Food Stamps
Housing Assistance
Medicaid
Supplemental Security Income
Low Income Home Energy Assistance Program
Temporary Assistance for Needy Families
Senior citizen low-income discount plan offered by
local gas or power company

Graphic:

First Month Free
Caller ID
Call Waiting
FREE Long Distance

No Deposit
No Credit Check
(call for details - local AT&T service areas only)

Graphic:

\$19.95 per month
(plus taxes and fees)

**Graphic continuously at
the bottom of the screen**

Telecircuit -1-800-738-0057
www.telecircuit.com

Audio

Are you currently receiving any type
of government assistance?

If so, you may qualify for government
assisted home telephone service for
only \$19.95 per month.

Call today and your first month is
FREE, including Caller ID and Call
Waiting plus free long distance each
month. There is no credit check and
no deposit.

Call today at 1-800-738-0057 to
receive your first month of
government assisted home phone
service FREE.

CALL 1-800-738-0057 NOW.

SWITCH YOUR PHONE SERVICE TO TELECIRCUIT AND GET ONE MONTH FREE!



app revised
10/01/2011

Agency Name And/Or Number

Agent Name Agent Number Date

Customer Service Number 1-877-835-3247

Customer General Information

First Name				Last Name			
Street Number	Street Name	Apt/Lot	City	County	State	Zip	
If your address differs from your service address, please enter your postal address in the space below							
Street Number	Street Name	Apt/Lot	City	County	State	Zip	
SSN or Tax ID (Lifeline Customers)		Contact Phone Number		Have you been referred by someone? Include Name			

General Information About Phone Lines and Customers' Premises

Phone Line Information

Is this a new activation? Yes ☐ No ☐
Do you want to keep the same number? Yes ☐ No ☐

Current Carrier Current Phone Number

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Customer Premises Information

Is there any phone line working in the house? Yes ☐ No ☐
Is there a second phone line? Yes ☐ No ☐
Are all connections ready? (phone jacks) Yes ☐ No ☐
Are they in good shape? Yes ☐ No ☐

PLEASE SELECT YOUR LOCAL SERVICE PROMOTION PLAN

PROMOTIONAL OFFER . . . FIRST MONTH FREE. . . NO ACTIVATION FEE!

Choose Your Plan Now-Circle The Amount

(includes 100 minutes long distance each month)

Lifeline Plus Service	\$19.95
Includes Caller ID & Call Waiting	
Lifeline Premium Service	\$29.95
Includes Caller ID, Call Waiting, 3-Way Calling and Call Return, Call Forwarding	
Voice Mail	\$ 7.95
Inside Wire Maintenance Monthly	\$ 8.95
Internet Dial-Up 5 times faster	\$10.00

(all prices PLUS taxes and fees)

Total Paid for Activation

Account Set-Up Fee - Lifeline \$ _____

TOTAL PAID TODAY FOR ACTIVATION \$ _____

Terms of Service

For payment in full each month, Company will provide access to basic local exchange services plus optional services chosen and paid for by the customer. Service may not include long distance services, collect or third-number calls billed to the account, (e.g. 900, 976, 711, collect calls) or any other toll service that would result in an additional charge to the line. Customer accepts responsibility for payment for any tolls and or charges added by Customer in addition to the monthly service. Payment for service is due each month on the anniversary date of the initial connection. I understand connections under normal circumstances may take up to 7-10 business days. This is an introductory pricing available to new customers only. Pricing is subject to change without notice.

If you are receiving any of the approved forms of Government Assistance (Visit lifelinesupport.org for applicable programs) you may qualify for Lifeline/Link Up for home telephone Service. Lifeline/Link Up is provided through the FCC's Low Income Program of the Universal Service Fund.

Through my signature hereunder, I hereby chose Telecircuit Corporation to be my local service provider for the telephone numbers listed above. I hereby designate Telecircuit as my duly appointed agent to affect the changes in my carrier selection to Telecircuit. I understand that I may only designate one carrier per service type and that either or both my previous carrier or my new carrier may charge me a fee per line to change service providers. I represent that I have authority to change carriers for each of the numbers listed and I am at least Eighteen (18) years old.

Customer Name

Signature

Date