



January 24, 2012

filed electronically in docket office on 01/24/12

Dr. Kenneth Hill, Chairman Attention: Sharla Dillon Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

Re:

Docket 11-00201

Dear Sharla:

Please file these responses to the staff's data requests in the above-captioned docket.

Thanks.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

Henry Walker

HW/mkc Enclosure

BEFORE THE TENNESEE REGULATORY AUTHORITY

Docket No. 11-00201

FIRST RESPONSE OF LIBERTY-BELL TELECOM LLC dba DISH NETWORK PHONE & INTERNET TO FIRST SET OF STAFF DATA REQUESTS

Liberty-Bell Telecom LLC dba DISH Network Phone & Internet ("DP&I") provides the following information in response to the First Set of Data Requests from the Staff of the Tennessee Regulatory Authority dated January 9, 2012:

1. A surety bond or irrevocable line of credit in compliance with TCA § 65-4-125(j).

Response: A surety bond (irrevocable line of credit) in the amount of \$20,000 in compliance with TCA § 65-4-125(j) has been requested and will be provided as soon as it becomes avaiable.

2. A sample bill.

Response: DP&I provides two sample invoices. The first reflects when a customer receives only telecommunications services. The second is used when a customer receives "triple play' services such as satellite television, internet and local phone services. They are attached as Exhibit B.

3. A list of states in which Liberty-Bell Telecom LLC d/b/a DISH Network Phone & Internet is currently providing services, and whether there have been any consumer complaints filed against the company with any state or federal agency. If so, provide details regarding the nature of the complaints and how they were resolved.

Response: DP&I provides services in Colorado, New Mexico, Utah, Wyoming, Nebraska, Iowa, Minnesota, South Dakota, North Dakota, Idaho, Montana, Washington, Oregon and Arizona. No formal complaints have been filed at any state commission against DP&I. The informal complaints are included in the spreadsheet attached as Exhibit C. In all instances the issues were resolved in a manner satisfactory to the customer.

In addition, DP&I is certificatated in, but not providing services, to Alabama, Florida, Illinois, Indiana, Kentucky, Michigan, Missouri, Nevada, New Jersey, New Mexico, Oklahoma, South Carolina, Texas and Wisconsin.

4. Exhibit E was not included in the original filing. Provide current financial information for the applicant.

Response: DP&I provides confidental financial information as Exhibit D to this filing. This information should have been filed with the original application. DP&I considers information concerning its finances to be

proprietary and confidential and should not be released to the public. Information for calendary year 2011 is not available at this time.

Exhibit A

The required Surety Bond will be filed as soon as it is available.

Exhibit B Sample Invoices





Telephone & Internet Account Number



Television Services Account Number

Invoice Number: 4231 Invoice Date: 07/25/2011 Due Date: 08/15/2011 Total Amount Due: \$46.95



Account Summary

Previous Balance	\$112.96
Payments & Adjustment	s \$112.96
Balance Forward	\$0.00

Current Telephone and/or Internet Charges

Talanhana and/a	or Internet Service	*	\$27.32
releptione and/c	n interier ogivice	, S	JC1.02
Tayaa 9 Curaha			\$19.63
Taxes & Surchar	UUD		319.00
	A Maria Control of the Control of th		
Total Talannon	and/or Internet	Charnee	\$46.95
I WASKE I WILLIAM IN THE	* ******** *** ****** * * * * * * * *	W # 1 PH 1 PE PAR	1377U.JU

Current Television Charges

Television Service	\$0,00
Taxes & Surcharges	\$0.00
Total Television Charges	\$0.00
TOTAL AMOUNT DUE	\$46.95

Never incur late fees! Sign up for AutoPay!









Contact Us

Billing Inquiries / Payment;	855-347-3474
Telephone & Internet Support:	855-347-3474
Television Support:	888-811-0210

http://bundles.dish.com

About your DISH Network Bill

Your monthly bill is mailed approximately 2 days after your bill period begins. Your balance is due by the "Due Date" shown on your bill, which is approximately 20 days after your service period begins.

Any changes you make to your service in the middle of your service period may result in partial month charges for added services and partial credits for discontinued services.

*Phone and Internet services are provided by Liberty-Bell Telecom LLC, d/b/a Dish Network Phone and Internet, a subsidiary of Dish Network.

PLEASE DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT



Telephone & Internet Account Number

Invoice Number:

4231

Television Services Account Number

Invoice Date: 07/25/2011 Due Date: 08/15/2011

Total Amil Due:

546.95

Amount Enclosed:

ADDRESSEE

190 1 MB 0.390 2129 1



ROSN5622

DISH Network

PO BOX 52829 Phoenix, AZ 85072-2829

001007210000423100000046959

Page 2 of 2

Telephone & Internet Account Number

Telephone and/or Internet Services

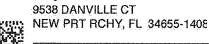
Invoice Number: 4231 Invoice Date: 07/25/2011 Due Date: 08/15/2011

Current Charges

546.95

19.63

Mary Italiano



Billing Inquires: 855-347-3474

Telephone & Internet Support: 855-347-3474 Telephone and Internet services are provided by Liberty-Bell Telecom LLC, d/b/a DISH Network Phone & Internet, a subisidiary of DISH Network. Telephone service may not be disconnected for non-payment of charges relating to unregulated services including internet, long distance and television.

Important Messages:

You are enrolled in Auto-Pay, 46.95 will be charged to your BANK ACCOUNT/CREDIT CARD xxxxxxxxxxxx7795 on 08/15/2011.

Description				
	and Credits		07/24/2011 to 08/23/2011	0.0
Total Recurrin			01/24/2022 00 00/25/2022	0.0
curring Charges				0.0
Description				
Phone Service Standard Long I		कि कि तह के का को का की की की का का की का की की की की की की का की का की की का का की की का का की की का का का की की की क	07/24/2011 to 08/23/2011 07/24/2011 to 08/23/2011 07/24/2011 to 08/23/2011	25. 0. 2.
Total Recurring	Charges			27.2
ng Distance:				
Call Number	Call Time	Destination	Duration	
	07/10/2011 07:56:02	en en la en un en copei en paren en en product en en en en en en en en en	1.4	0.0
Total Long Dist	ance			0.0
scellaneous Acti	vity:			
Description	e uni del mit deu uni une une uni uni para del	07/18/2011		-112.9
Description	you		म् कथा मा मा के क्षेत्र के को को तेन तथ के मा मा भर का का मा मा का का मा का को मा मा को को का का मा मा का का का	
Description Payment - Thank	you eous Activity		म्ब के का और तेत कुम को कर कि का के का कुम का का का कि का का कुम की का को का कुम को के का का तुम का का का का क -	
Description Payment - Thank Total Miscellan gulatory Taxes a Description	you eous Activity nd Surcharges:	07/18/2011		-112.5 -112.5

Total Regulatory Taxes and Surcharges

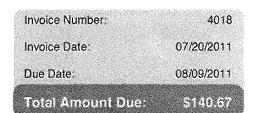


Page 1 of 4

Telephone & Internet Account Number



Television Services Account Number





Account Summary

Previous	Balance			\$250.63
Payment	s & Adjust	mente		\$250.63
i uymem	o a Aajast	momo		ψΕΟΟ.ΟΟ
Ralance	Forward			\$0.00
Dalance	i viwaiu			40.00

Current Telephone and/or Internet Charges

Telephone	and/or Inte	rnet Servic	es*	\$84.00
Taxes & Su				\$18.46
				• • • • • • • • • • • • • • • • • • • •
Total Teler	hone and	/or Interne	t Charges	\$102.46

Current Television Charges

Television Service	\$36.99
Taxes & Surcharges	\$1.22
Total Television Charges	\$38.21
TOTAL AMOUNT DUE	\$140.67
District the second of the sec	3170.01

Never incur late fees! Sign up for AutoPav!

http://bundles.dish.com/billing



Contact Us

Billing Inquiries / Payment:	855-347-3474
Telephone & Internet Support:	855-347-3474
Television Support:	888-811-0210

http://bundles.dish.com

About your DISH Network Bill

Your monthly bill is mailed approximately 2 days after your bill period begins. Your balance is due by the "Due Date" shown on your bill, which is approximately 20 days after your service period begins.

Any changes you make to your service in the middle of your service period may result in partial month charges for added services and partial credits for discontinued services.

*Phone and Internet services are provided by Liberty-Bell Telecom LLC, d/b/a Dish Network Phone and Internet, a subsidiary of Dish Network.

PLEASE DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT



Telephone & Internet Account Number

Television Services Account Number

Invoice Number:

4018

Invoice Date: Due Date:

07/20/2011 08/09/2011

Total Amt Due:

5140.67

Amount Enclosed:



531 2 MB 0.515 2116 2



RDSN5622

DISH Network

PO BOX 52829 Phoenix, AZ 85072-2829 Madadalallandardalalalaladandiddalaadalalalaada

0010059900004018000000140672

desh Network.

Page 2 of 4

Telephone & Internet Account Number

Telephone and/or Internet Services

Invoice Number: 4018
Invoice Date: 07/20/2011
Due Date: 08/09/2011

Current Charges: \$102.46



Billing Inquires: 855-347-3474

Telephone & Internet Support: 855-347-3474

Telephone and Internet services are provided by Liberty-Bell Telecom LLC, d/b/a DISH Network Phone & Internet, a subisidiary of DISH Network.

Telephone service may not be disconnected for non-payment of charges relating to unregulated services including Internet, long distance and television.

Description	***************************************	
Other Charges and Credits Multiple Service Discount	07/20/2011 to 08/19/2011 07/20/2011 to 08/19/2011	0.00 -5.00
Total Recurring Charges		-5.00
Recurring Charges:		
Description		
Phone Service 3,000 Minutes Published Directory Listing	07/20/2011 to 08/19/2011 07/20/2011 to 08/19/2011 07/20/2011 to 08/19/2011	25.00 20.00 0.00
Total Recurring Charges		45.00
Recurring Charges: Internet (000) 000-0000		
Description		
1.5 mbps Modem Rental	07/20/2011 to 08/19/2011 07/20/2011 to 08/19/2011	39.00 5.00
Total Recurring Charges		44.00

Long Distance:	
----------------	--

Call Number	Call Time	Destination	Duration	
Call Number	06/20/2011 10:04:44 06/20/2011 10:06:11 06/24/2011 17:54:18 06/24/2011 17:54:18 06/24/2011 21:05:14 07/01/2011 14:34:53 07/03/2011 10:11:08 07/06/2011 07:33:48 07/06/2011 10:44:28 07/08/2011 06:46:10 07/09/2011 09:02:7 07/10/2011 09:42:39 07/11/2011 06:17:40 07/12/2011 12:05:41 07/12/2011 12:05:41 07/12/2011 12:05:41 07/12/2011 12:05:41 07/12/2011 06:34:18 07/15/2011 08:39:11 07/15/2011 08:13:54 07/15/2011 08:13:54 07/15/2011 08:13:54 07/15/2011 08:39:11 07/15/2011 08:39:11 07/15/2011 08:39:11 07/15/2011 08:39:11 07/15/2011 08:39:11 07/15/2011 08:30:07 07/17/2011 06:10:51 07/17/2011 10:51 07/17/2011 10:51 07/17/2011 10:51 07/17/2011 12:05:40 07/17/2011 12:05:40	Destination	1.2 1.0 3.9 17.3 21.3 1.5 19.3 4.7 8.5 12.1 4.3 6.1 28.5 6.5 2.1 10.2 4.0 21.1 1.2 0.4 1.2 2.4 0.7 0.7 0.8 7.0 0.7	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0
	07/17/2011 20:04:09 07/18/2011 06:40:05 07/18/2011 16:20:24 07/19/2011 06:09:49			0.00 0.00 0.00 0.00
Total Long Dista	ince			0,00

Miscellaneous Activity:

176_0204511 Description

Page 3 of 4

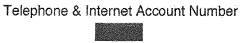
Telephone and/or Internet Services

Invoice Number: 4018 Invoice Date: 07/20/2011 08/09/2011

Due Date:

Current Charges:

\$102.46



Billing Inquires: 855-347-3474

Telephone & Internet Support: 855-347-3474

Telephone and Internet services are provided by Liberty-Bell Telecom LLC, d/b/a DISH Network Phone & Internet, a subisidiary of DISH Network.

Payment - Thank you	07/07/2011	-250.6
Total Miscellaneous Activity		-250.6
ulatory Taxes and Surcharges:		
Description		
Carrier Access Fee (Other) E 911 (County) FCC Authorized Line Charge (Other) FCC Regulatory Fee (Wireline) (Federal) Fed Universal Service Fund (Federal) Federal Excise Tax (Federal) Local Number Portability Fee (Other) Sales Tax (State) Sales Tax (County) State Universal Service Fund (State) Telecommunications Assistance Service Fund Telecommunications Relay Service Surcharge Transit Tax (County) District Tax (County)		2.9 0.5 6.5 0.0 3.5 0.9 0.4 1.2 0.2 1.1 0.0 0.2 0.4

Page 4 of 4

Television Services Account Number

Television Services

Invoice Number: 4018 Invoice Date: 07/20/2011 Due Date: 08/09/2011

Current Charges:

\$38.21



Billing Inquires: 855-347-3474

Television Support: 888-811-0210

Recurring Monthly Charges: Television	
Description	
FROM 07/09/2011 PROTECTION PLAN (15) FROM 07/09/2011 AMERICA'S TOP 120 FROM 07/09/2011 CR: PREMIUM \$XX3 MO FROM 07/20/2011 TO 08/19/2011 PROTECTION PLAN (15) FROM 07/20/2011 TO 08/19/2011 HD SOLO RECEIVER FROM 07/20/2011 TO 08/19/2011 HBO FROM 07/20/2011 TO 08/19/2011 AMERICA'S TOP 120	-6.00 -15.00 -16.00 -6.00 7.00 16.00 44.99
Total Recurring Monthly Charges	36.99
Taxes and Fee's: Television	
Description	
FROM 07/09/2011 STATE/LOCAL TAXES FROM 07/13/2011 STATE/LOCAL TAXES	-0.45 1.67
Total Taxes and Fee's	1.22

Exhibit C Informal Complaints

Colorado PUC Informal Complaints by Year

Total 2004	Total 2005 15	Total 2006	Total 2007	Total 2008	Total 2009 5	Total 2010 9	Total 2011
Feb-04 Mar-04 Apr-04 May-04 Jun.04 Jul.64 Aug-04 Sep-04 Oct-04 Nov-04 Dec-04 Total 2004 - 1 1 2 1 2 1 3 14	Feb-05 Mar-05 Apr-05 Apr-05 Jun-05 Jul-05 Aug-05 Sep-05 Oct-05 Nov-05 Dec-05 3 1 1 1 1 4 1 2 - 1 15 15 15 15 15 15 15 15 15 15 15	Feb-06 Mar-06 Apr-06 Jun-06 Jul-06 Aug-06 Sep-06 Oct-06 Nov-06 Dec-06 Total 2006 8	Feb:07 Mar-07 Apr-07 Jun-07 Jul-07 Aug-07 Sep.07 Octs-07 Nov-07 Dec-07 - 1 2 4 - 1 14	Feb-08 Mar-08 Apr-08 Jun-08 Jul-08 Aug-08 Sep-08 Oct-08 Nov-08 Dec-08 Total 2008	Feb-09 Mar-09 Apr-09 Aui:09 Aug-09 Sep-09 Oct-09 Dec-09	Feb-10 Mar-10 Apr-10 May-10 Jul-10 Aug-10 Sep-10 Oct-10 Nov-10 Dec-10 1 1 - 2 - 2 - 2	Feb-11 Mar-11 Apr-12 Jun-13 Jul-13 Aug-13 Sep-13 Oct-11 Nov.11 Dec-13 Total 2013 1 1 1 1 - 1 - - 3
Jan-04	Jan-05	Jan-06	Jan-07 3	jan-08	Jan-09 2	Jan-10	Jan-11