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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:

A handwritten signature of Henry Walker in black ink.

Henry Walker

HW/mkc  
Enclosure

***BEFORE THE TENNESSEE 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 available.

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 certificated 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 confidential 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 calendar 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 &amp; Internet Account Number

Invoice Number: 4231

Invoice Date: 07/25/2011

Due Date: 08/15/2011

Total Amount Due: \$46.95

Television Services Account Number

**Account Summary**

Previous Balance	\$112.96
Payments & Adjustments	\$112.96
<b>Balance Forward</b>	<b>\$0.00</b>

**Current Telephone and/or Internet Charges**

Telephone and/or Internet Services*	\$27.32
Taxes & Surcharges	\$19.63
<b>Total Telephone and/or Internet Charges</b>	<b>\$46.95</b>

**Current Television Charges**

Television Service	\$0.00
Taxes & Surcharges	\$0.00
<b>Total Television Charges</b>	<b>\$0.00</b>
<b>TOTAL AMOUNT DUE</b>	<b>\$46.95</b>

**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.

Never incur late fees!

**Sign up for AutoPay!**<http://bundles.dish.com/billing>

PLEASE DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT



PO BOX 9730  
TOLEDO, OH 43697-9730  
<http://bundles.dish.com>

Telephone &amp; Internet Account Number

Invoice Number: 4231

Invoice Date: 07/25/2011

Television Services Account Number

Due Date: 08/15/2011

Total Amt Due: \$46.95

Amount Enclosed:

**ADDRESSEE:**

190 1 MB 0.390 2129 1

**REMIT TO:**

ROSN5622

**DISH Network**  
PO BOX 52829  
Phoenix, AZ 85072-2829



001007210000423100000046959



## Telephone and/or Internet Services

Telephone &amp; Internet Account Number

Mary Italiano

9538 DANVILLE CT

NEW PRT RCHY, FL 34655-1408

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

Current Charges: \$46.95

Billing Inquires: 855-347-3474

Telephone &amp; Internet Support: 855-347-3474

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

## Recurring Charges: Other Charges and Credits (000) 000-0000

Description		
Other Charges and Credits	07/24/2011 to 08/23/2011	0.00
Total Recurring Charges		0.00

## Recurring Charges:

Description		
Phone Service	07/24/2011 to 08/23/2011	25.00
Standard Long Distance	07/24/2011 to 08/23/2011	0.00
Non-published Directory Listing	07/24/2011 to 08/23/2011	2.25
Total Recurring Charges		27.25

## Long Distance:

Call Number	Call Time	Destination	Duration	
	07/10/2011 07:56:02		1.4	0.07
Total Long Distance				0.07

## Miscellaneous Activity:

Description		
Payment - Thank you	07/18/2011	-112.96
Total Miscellaneous Activity		-112.96

## Regulatory Taxes and Surcharges:

Description	
Business and Occupation Tax (City)	2.66
Carrier Access Fee (Other)	2.99
E 911 (County)	0.52
FCC Authorized Line Charge (Other)	6.50
FCC Regulatory Fee (Wireline) (Federal)	0.03
Fed Universal Service Fund (Federal)	1.44
Federal Excise Tax (Federal)	1.06
Local Number Portability Fee (Other)	0.43
Sales Tax (County)	0.18
Sales Tax (State)	1.05
Sales Tax (City)	1.09
State Universal Service Fund (State)	1.03
Telecommunications Assistance Service Fund (State)	0.03
Telecommunications Relay Service Surcharge (State)	0.20
Transit Tax (County)	0.36
District Tax (County)	0.06
Total Regulatory Taxes and Surcharges	19.63



Telephone &amp; Internet Account Number

Invoice Number: 4018

Invoice Date: 07/20/2011

Due Date: 08/09/2011

Total Amount Due: \$140.67

Television Services Account Number

**Account Summary**

Previous Balance	\$250.63
Payments & Adjustments	\$250.63
<b>Balance Forward</b>	<b>\$0.00</b>

**Current Telephone and/or Internet Charges**

Telephone and/or Internet Services*	\$84.00
Taxes & Surcharges	\$18.46
<b>Total Telephone and/or Internet Charges</b>	<b>\$102.46</b>

**Current Television Charges**

Television Service	\$36.99
Taxes & Surcharges	\$1.22
<b>Total Television Charges</b>	<b>\$38.21</b>
<b>TOTAL AMOUNT DUE</b>	<b>\$140.67</b>

**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.

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PLEASE DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT



PO BOX 9730  
TOLEDO, OH 43697-9730  
<http://bundles.dish.com>

Telephone &amp; Internet Account Number

Invoice Number: 4018

Invoice Date: 07/20/2011

Television Services Account Number

Due Date: 08/09/2011

Total Amt Due: \$140.67

Amount Enclosed:

**ADDRESSEE:**

531 2 MB 0.515 2116 2

**REMIT TO:**

RDSN5622

**DISH Network**

PO BOX 52829

Phoenix, AZ 85072-2829

001005990000401800000140672





## Telephone and/or Internet Services

Telephone &amp; Internet Account Number

Invoice Number: 4018

Invoice Date: 07/20/2011

Due Date: 08/09/2011

Current Charges: \$102.46

Billing Inquires: 855-347-3474

Telephone &amp; Internet Support: 855-347-3474

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

## Recurring Charges: Other Charges and Credits (000) 000-0000

Description		
Other Charges and Credits	07/20/2011 to 08/19/2011	0.00
Multiple Service Discount	07/20/2011 to 08/19/2011	-5.00
Total Recurring Charges		-5.00

## Recurring Charges:

Description		
Phone Service	07/20/2011 to 08/19/2011	25.00
3,000 Minutes	07/20/2011 to 08/19/2011	20.00
Published Directory Listing	07/20/2011 to 08/19/2011	0.00
Total Recurring Charges		45.00

## Recurring Charges: Internet (000) 000-0000

Description		
1.5 mbps	07/20/2011 to 08/19/2011	39.00
Modem Rental	07/20/2011 to 08/19/2011	5.00
Total Recurring Charges		44.00

## Long Distance:

Call Number	Call Time	Destination	Duration	
	06/20/2011 10:04:44		1.2	0.00
	06/20/2011 10:06:11		1.0	0.00
	06/24/2011 17:54:18		3.9	0.00
	06/24/2011 21:04:27		17.3	0.00
	06/27/2011 21:05:14		21.3	0.00
	07/01/2011 14:34:53		1.5	0.00
	07/03/2011 10:11:08		19.3	0.00
	07/06/2011 07:33:48		4.7	0.00
	07/06/2011 10:44:28		8.5	0.00
	07/08/2011 06:46:10		12.1	0.00
	07/09/2011 09:00:17		4.3	0.00
	07/10/2011 09:42:39		6.1	0.00
	07/11/2011 06:17:40		28.5	0.00
	07/12/2011 06:00:29		6.5	0.00
	07/12/2011 12:05:41		2.1	0.00
	07/12/2011 15:13:53		10.2	0.00
	07/12/2011 21:16:54		4.0	0.00
	07/13/2011 06:34:18		21.1	0.00
	07/15/2011 07:31:48		1.2	0.00
	07/15/2011 08:12:54		0.4	0.00
	07/15/2011 08:13:54		1.2	0.00
	07/15/2011 08:39:11		2.4	0.00
	07/15/2011 08:44:07		1.0	0.00
	07/15/2011 08:51:33		0.7	0.00
	07/16/2011 06:31:58		0.8	0.00
	07/16/2011 06:33:07		7.0	0.00
	07/17/2011 06:10:51		4.2	0.00
	07/17/2011 17:35:03		1.3	0.00
	07/17/2011 20:04:09		41.1	0.00
	07/18/2011 06:40:05		12.8	0.00
	07/18/2011 16:20:24		1.1	0.00
	07/19/2011 06:09:49		0.7	0.00
Total Long Distance				0.00

## Miscellaneous Activity:

176\_0204511 Description



## Telephone and/or Internet Services

Telephone &amp; Internet Account Number

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

Current Charges:	\$102.46
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Billing Inquires: 855-347-3474

Telephone &amp; Internet Support: 855-347-3474

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

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

Payment - Thank you	07/07/2011	-250.63
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Total Miscellaneous Activity	-250.63
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## Regulatory Taxes and Surcharges:

Description	
Carrier Access Fee (Other)	2.99
E 911 (County)	0.52
FCC Authorized Line Charge (Other)	6.50
FCC Regulatory Fee (Wireline) (Federal)	0.08
Fed Universal Service Fund (Federal)	3.53
Federal Excise Tax (Federal)	0.99
Local Number Portability Fee (Other)	0.43
Sales Tax (State)	1.29
Sales Tax (County)	0.23
State Universal Service Fund (State)	1.12
Telecommunications Assistance Service Fund (State)	0.03
Telecommunications Relay Service Surcharge (State)	0.20
Transit Tax (County)	0.45
District Tax (County)	0.10
Total Regulatory Taxes and Surcharges	18.46



Television Services Account Number

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)	-6.00
FROM 07/09/2011 AMERICA'S TOP 120	-15.00
FROM 07/09/2011 CR: PREMIUM \$XX3 MO	-16.00
FROM 07/20/2011 TO 08/19/2011 PROTECTION PLAN (15)	6.00
FROM 07/20/2011 TO 08/19/2011 HD SOLO RECEIVER	7.00
FROM 07/20/2011 TO 08/19/2011 HBO	16.00
FROM 07/20/2011 TO 08/19/2011 AMERICA'S TOP 120	44.99

Total Recurring Monthly Charges 36.99

## Taxes and Fee's: Television

## Description

FROM 07/09/2011 STATE/LOCAL TAXES	-0.45
FROM 07/13/2011 STATE/LOCAL TAXES	1.67

Total Taxes and Fee's 1.22

*Exhibit C*

*Informal Complaints*

Colorado PUC Informal Complaints by Year

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