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November 16, 2012

Lance J.M. Steinhart, P.C.
Lance J.M. Steinhart
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

RE: Docket No. 12-00122, *Application of Integrated Services, Inc. for a Certificate to Provide Resold Interexchange Telecommunications Services in Tennessee*

Dear Mr. Steinhart:

The Tennessee Regulatory Authority is in receipt of the above application for authority to provide resold long distance telecommunications services in Tennessee. In order to process the application, please provide the following:

1. Question H of the application on page 3 asks for the name and telephone number of a contact person authorized to respond to Authority inquiries regarding company operations Monday through Friday. No name is listed and the telephone number, (847)205-2743 is answered by an automated system as "Back Office Support Systems." The recording goes on to list several other entities at the same number, including "Contact Center Solutions," "Community Strategies, Inc.," and "Omni Point Energy, Inc." Provide the name of a contact person at Integrated Services, Inc. who can be contacted regarding Authority inquiries about the company and a direct phone number for that person.
2. What is the business relationship between Integrated Services, Inc. and Back Office Support Systems, Contact Center Solutions, Community Strategies, Inc. and Omni Point Energy?
3. Question B of the application on page 2 asks if there are any other businesses or business transactions at the same location as the principal's (Integrated Services, Inc.) business address. The question was answered as "none." Please explain any association Integrated Services, Inc. has with "Back Office Support Systems," "Contact Center Solutions," "Community Strategies, Inc." or "Omni Point Energy, Inc."
4. The principal address listed for Integrated Services, Inc., 5 Revere Drive, One Northbrook Place, Suite 200, Northbrook, Illinois 60062, appears to merely be a meeting room available for hourly or daily rental. Where does Integrated Services, Inc. conduct its business and keep its business records? The application indicates the company has 5 employees. Where do those employees report to work?

5. Article IV Section 1. of the company's Bylaws indicate that "The officers of the Corporation shall be a President, a Secretary and a Treasurer." The application for Integrated Services, Inc. only contained biographical information for the President, Mr. Larry Gilleland. Provide biographical information or resumes for any other officers of the company, including specific education and/or experience in the telecommunications industry.
6. The application indicates Integrated Services, Inc. was formed in Nevada on March 24, 2006 and is authorized to provide telecommunications services in 39 states. However, the financial information provided with the Tennessee application was for the period January through June 30, 2012. Please provide detailed financial information for the three (3) year period prior to 2012, including balance sheets, income statements and statements of cash flows.
7. For the financials that were included in the application, please explain line item 4022 – Revenue Trail Receipts, and line item 4023 – Contra Revenue Account.
8. The financial statements indicate Telemarketing Expense at line 5020. These expenses are broken down further in to Telemarketing Leads, line 5021, Leads Prequalification, line 5022, Verification Expense, line 5023 and Telemarketing Expense – Other. What telemarketing company does Integrated Services, Inc. do business with? Provide a copy of the contractual agreement between Integrated Services, Inc. and the telemarketing company. Is the telemarketing company paid by commission for each customer it brings to Integrated Services, Inc.? Provide a copy of the telemarketing script that will be used in Tennessee.
9. Tenn. Code Ann. 65-4-401 *et seq.* and TRA Rule 1220-4-11 set forth the definitions, rules and requirements for telephone solicitations in Tennessee. These apply no matter where the call originates, when calling a Tennessee residential telephone customer who has placed their telephone number on a list of residents objecting to solicitation calls. The statute also requires both the entity contracting with the telemarketer and the telemarketing company to both register as solicitors with the Tennessee Regulatory Authority. Provide a sworn affirmation that Integrated Services, Inc., as well as the telemarketing company it contacts with for telemarketing services, will comply with both Tenn. Code Ann. § 65-4-401 *et seq.* and TRA Rule 1220-4-11.
10. Whose facilities-based network(s) will Integrated Services, Inc. be reselling in Tennessee? Does Integrated Services, Inc. resell the same carrier's services in other states? If so, provide a copy of the resale agreement between Integrated Services, Inc. and the facilities-based provider.
11. Integrated Services, Inc. indicates in its application that it will use a third party billing company. Provide the name, address, and contact telephone number for the third party billing company to be used. Also provide a copy of the contract between Integrated Services, Inc. and the third party billing company.
12. From the financial records provided, it is apparent that Integrated Services, Inc. will be conducting sales through telemarketing. However, question N. on page 5 of the application indicates that applicant will also use "web and direct sales" to market its services in Tennessee. Provide a more thorough explanation of these web and direct sales, including copies of any online advertisements and a more specific explanation of direct sales activities to be conducted in Tennessee.

13. Question P. on page 5 of the application indicates that Integrated Services, Inc. will “attempt to get a written letter of agency. If not, all orders will be third party verified in accordance with applicable state and federal regulation.” Provide the name, address and contact telephone number of the third party verification company to be used to verify orders in Tennessee.
14. The verification page bearing the signature of Mr. Larry Gilleland, President of Integrated Services, Inc. appears to be a stamped copy of Mr. Gilleland’s signature rather than an original. Provide a verification page with a properly notarized original signature, with the signor certifying that all representations in the Reseller Application and all attachments and appendices are true and correct to the best of their knowledge and belief, and the understanding that omissions or inaccuracies may result in denial of the application.
15. The Notary Public seal of Michelle E. Gillies is illegible. In what state or jurisdiction is Ms. Gillies commissioned and on what date does her commission expire? Please provide a copy of her certificate granting notary public status.
16. Regarding Tenn. Code Ann. § 65-21-114, provide more specific detail as to how Integrated Services, Inc. will comply with the statute regarding county-wide calling.
17. Further explain the “Carrier Cost Recovery Charge” detailed on the company’s tariff sheet 27. What service does the customer receive for this charge? Note: Tariffs can only contain charges for services rendered and must be optional.
18. Further explain the “Payphone Dial Around Surcharge” and “Universal Service Fund Assessment” charge listed on tariff page 28. Note: Tariffs can only contain charges for services rendered and must be optional.

It is requested that this information be provided no later than 2:00 pm on November 30, 2012 and that you reference Docket Number 12-00122 on the response. In accordance with TRA rules submit either (1) thirteen written copies of your response or (2) four written copies and an electronic version. Should you have questions regarding this request, please contact Lisa Foust at 615-741-2904 extension 220.

Sincerely,

A handwritten signature in black ink, appearing to read "D Foster", written in a cursive style.

David Foster
Utilities Division Chief