

TENNESSEE REGULATORY AUTHORITY

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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. 12-00123, *Application of Communications Network Billing, 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. The application lists the principal place of business for Communications Network Billing, Inc. as 895 Dove Street 3rd Floor Newport, Beach, CA 92660. Is this where the employees of Communications Network Billing, Inc. report to work? Is this also where the company's business records are kept?
2. The application provides the name of Cristina M. Tucker at the telephone number (301) 571-2435 as the contact to respond to inquiries from the Authority. However, Staff dialed the telephone number and was told that this telephone number is to an answering service and at this time there is no business affiliated with that number, nor did the service have any information about Cristina M. Tucker or Communications Network Billing, Inc. Please explain.
3. Public records from the Texas Public Utilities Commission list Alicia G. Treder as the regulatory contact for Communications Network Billing, Inc. However, the address listed for Communications Network Billing, Inc. in filings in the state of Texas list the company address as 300 Maple Park Blvd., Suite 301 in St. Clair Shores, Michigan 48081. What is Communications Network Billing, Inc.'s connection or affiliation with the address in St. Clair Shores, Michigan?
4. Question C on page 4 of the application for a list of states where the applicant is authorized to operate at this time, as well as a history of operations there. The attachment provided in response is a list of states, but does not contain a history of operations in those states. Please provide a history of operations in each state listed in the attachment, including any complaints filed against the company and how they were resolved.

5. The second portion of Question C on page 4 of the application asks for a list of the number and types of complaints filed against the applicant and the applicant's current status regarding each complaint. The answer is provided as "none." However, a public records search revealed at least three (3) FCC actions against Communications Network Billing, Inc. for unauthorized change of subscriber's telecommunications carrier as well as complaints filed in Iowa and Florida. Please explain.
6. Who will Communications Network Billing, Inc. use as its "third party billing company" as indicated in question M. on page 5 of the application? 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 Communications Network Billing, Inc. and the third party billing company.
7. The response to question P on page 5 of the application indicates that Communications Network Billing, Inc. will "attempt to get a written letter of agency" when switching a consumer's long distance. Provide a copy of the letter of agency to be used when switching the long distance service of consumers in Tennessee.
8. The response to question P further states that if a written letter of agency cannot be obtained, all orders will be third party verified. Provide the name of the third party verification company to be used to verify orders in Tennessee, a copy of the script to be used in verifying long distance change orders, as well as a copy of the contract between Communications Network Billing, Inc. and the third party verification company.
9. The verification page of the application does not contain an original signature. Also the notary did not indicate in which county of Michigan she is commissioned. Provide an original notarized signature for the verification page of the application, 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.
10. Article IV of the Bylaws of Communications Network Billing, Inc. indicates that there shall be a President, a Secretary and a Treasurer of the company. The management biographical information attached to the application only includes that of Cristina Tucker, President of Communications Network Billing, Inc. Who is the Secretary of Communications Network Billing, Inc.? Who is the Treasurer of the company? Provide biographical information for the other officers of the company, including all relevant education and experience in the telecommunications industry.
11. The cover sheet and footers of the tariff provided indicates that the address for Communications Network Billing, Inc. is at 200 S. Virginia, 8th Floor, Reno, Nevada. Provide the correct address for Communications Network Billing, Inc.

12. 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.
13. Further explain the "Payphone Dial Around Surcharge" and "Universal Service Fund Assessment" charge listed on tariff page 28. What service does the customer receive for this charge? Note: Tariffs can only contain charges for services rendered and must be optional.
14. The bond provided in the application is missing the printed name and title of the Principal below her signature, as well as the acknowledgment of principal and acknowledgment of surety pages. Please provide a properly signed and notarized acknowledgment for both the principal and surety, acknowledging the contents, accuracy and validity of the bond.
15. Regarding Tenn. Code Ann. § 65-21-114, provide more specific detail as to how Business Network Long Distance, Inc. will comply with the statute regarding county-wide calling.
16. Regarding Tenn. Code Ann. § 65-21-114, provide more specific detail as to how Business Network Long Distance, Inc. will comply with the statute regarding county-wide calling.

It is requested that this information be provided no later than 2:00 pm on November 30, 2012 and that you reference Docket Number 12-00123 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. M. Foster".

David Foster
Utilities Division Chief