

TENNESSEE REGULATORY AUTHORITY



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TRA DOCKET ROOM

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

December 5, 2012

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

RE: Docket No. ¹²⁻⁰⁰¹²⁵~~12-00122~~, *Application of Multiline Long Distance, 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 Multiline Long Distance, Inc. as 8044 Montgomery Road, Suite 700, Cincinnati, Ohio 45236. Is this where the employees of Multiline Long Distance, Inc. report to work? Is this also where the company's business records are kept?
2. Are there other businesses at the 8044 Montgomery Road, Cincinnati, Ohio address? If so, what types of businesses are also located there? Are any of those businesses affiliated with Multiline Long Distance, Inc.?
3. 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. The telephone number provided, 513-792-2780, 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 Multiline Long Distance, Inc. who can be contacted regarding Authority inquiries about the company and a direct phone number for that person.
4. Question C. on page 4 of the application asks 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 one (1) FCC action against Multiline Long Distance, Inc. for unauthorized change of subscriber's telecommunications carrier. Please explain.
 6. Who will Multiline Long Distance, Inc. use as its "third party billing agent" 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 Multiline Long Distance, Inc. and the third party billing company.
 7. Question N on page 5 of the application indicates that the applicant will be marketing its services through "web and direct sales." What type of direct sales will be conducted?
 8. The financial statements provided with the application indicate telemarketing expense. Will Multiline Long Distance, Inc. be engaged in any telemarketing of its services in Tennessee? If so, provide the name, address and telephone number of the telemarketing company that will be providing this service. Also include a copy of the contract between Multiline Long Distance, Inc. and the telemarketing company. Provide a copy of the telemarketing script to be used.
 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 Multiline Long Distance, 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. The response to question P on page 5 of the application indicates that Multiline Long Distance, 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.
11. 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 Multiline Long Distance, Inc. and the third party verification company.
12. On the verification page of the application signed by Everard Kidder Meade III, 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.
13. The signature of Mr. Everard Kidder Meade, III, President of Multiline Long Distance, Inc. appears to be a stamped copy of Mr. Meade’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.
14. Article IV of the Bylaws of Multiline Long Distance, 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 Mr. E. Kidder Meade. What is Mr. Meade’s title? Who is the Secretary of Multiline Long Distance, 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.
15. 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.
16. 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.

17. The bond provided in the application is missing the printed name and title of the Principal below his 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.
18. Regarding Tenn. Code Ann. § 65-21-114, provide more specific detail as to how Multiline Long Distance, Inc. will comply with the statute regarding county-wide calling.
19. The financial information provided with the application was a balance sheet as of June 30, 2012. Provide financial information for the preceding three-year period for Multiline Long Distance, Inc., including balance sheets, income statements and statements of cash flows.

It is requested that this information be provided no later than 2:00 pm on December 31, 2012 and that you reference Docket Number 12-00125 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 that reads "David Foster". The signature is written in a cursive, slightly stylized font.

David Foster
Utilities Division Chief