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November 2, 2010

Mr. Jeffrey R. DeRouen
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40601

RECEIVED

NOV 4 2010

PUBLIC SERVICE
COMMISSION

**RE: *Petition of All American Telecom, Inc. for Designation as Eligible
Telecommunications Carrier
Case No. 2009-00446***

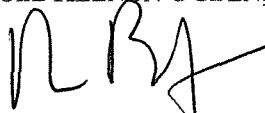
Dear Mr. DeRouen:

Enclosed please find an original and ten copies of All American Telephone, Inc.'s Response to First Data Request of Commission Staff.

Please acknowledge receipt of this filing by placing your file-stamp on the extra copy and returning to me via the enclosed self addressed stamped envelope. Thank you.

Sincerely yours,

STOLL KEENON OGDEN, PLLC


Douglas F. Brent

DFB: jms
Enclosures

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF

PETITION OF ALL AMERICAN TELECOM,)
INC. FOR DESIGNATION AS AN ELIGIBLE) CASE NO. 2009-00446
TELECOMMUNICATIONS CARRIER IN THE)
COMMONWEALTH OF KENTUCKY)

**RESPONSE OF ALL AMERICAN TELECOM, INC.
TO FIRST DATA REQUEST OF COMMISSION STAFF**

REQUEST 1 Is Kentucky the only state in which All American currently operates? If not, list the states.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American does not yet have customers in Kentucky or any other state.

REQUEST 2 List all states in which All American has received Eligible Telecommunications Carrier ("ETC") status. Also list all pending ETC petitions, with docket numbers and the state in which the designation is requested.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American was granted ETC status in Alabama in Docket No. 31151 on November 25, 2009. ATMS, ultimate parent of All American, operates affiliated companies with ETC designation in Alabama and determined that All American would not be marketing LifeLine service in Alabama. The affiliated companies have a well established presence therefore the marketing would be better served by efforts toward a recognized name. All American's application in North Carolina, Docket No. P100 Sub 133C, is pending with the commission.

REQUEST 3 Has All American filed for ETC status in any state and subsequently withdrawn the petition or been denied ETC status? If so, list the state, docket number, and All American's reason for seeking withdrawal of the petition for that state.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Status is currently pending with the Florida PSC; however, All American did withdraw the ETC application in Florida, Docket No. 090437-TX, on August 4, 2010. ATMS, ultimate parent of All American, operates affiliated companies with ETC designation in Florida and determined that All American would not be marketing Lifeline service in the state of Florida nor will All American have customers in Florida.

REQUEST 4 How many Kentucky residential and business customers does All American presently serve? Provide the number of residential and business customers and state whether they are provided service through Unbundled Network Elements ("UNEs") pursuant to 47 U.S.C. § 251 commingled with 47 U.S.C. § 271 elements, resale, or wholesale local platform pursuant to a commercial agreement.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American does not have any customers, as its business plan involves Lifeline service marketed to credit-challenged customers eligible for this federal assistance.

REQUEST 5 Does All American presently serve any Lifeline customers through resale in Kentucky?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No.

REQUEST 6 If All American receives ETC designation in Kentucky, approximately how long will it take for All American to offer Lifeline service in the area in which it receives the ETC designation? Provide an explanation for any extenuating or special circumstances.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: If granted ETC designation, All American would be able to serve customers within 90 – 120 days.

REQUEST 7 Do All American customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. § 54.101(a)(8)? If not, explain why.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Access to directory assistance is defined in 47 C.F.R. § 54.101(a)(8) as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings. All American plans to comply with 47 C.F.R. § 54.101(a)(8) by providing directory assistance for a fee.

REQUEST 8 All American's tariff states that: "Customers will have access to local operator services within the limitation imposed by the presence of the underlying carrier's toll restriction and billed number screening services." Explain the purpose for this tariff policy.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: This policy has been adopted to limit unauthorized charge to a customer's line. Customers are given an option of 1+ dialing or access to 800 numbers. The option not chosen by the customer will be subject to the underlying carrier's toll restriction.

REQUEST 9 Does All American understand that there may be an audit by the Commission of the use of universal service funds and that the eligible telecommunications service designation may be reviewed annually?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American is aware of the fact that the Commission reserves the right to audit the company regarding the use of universal service funds.

REQUEST 10 Has All American been audited by other state utility commissions regarding its use of universal service funds? If so, list the state and the result of the audit.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, All American has not been audited by another state utility commission regarding its use of universal service funds.

REQUEST 11 Does All American have any outstanding complaints at any state commissions or at the Federal Communications Commission ("FCC)? Provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American does not have any customer complaints at any state commission or the FCC.

REQUEST 12 Provide a description of All American's corporate structure, with both names and titles. Also provide a list of All American's owners or corporate officers and indicate if any are also owners, corporate officers or employees of any other telecommunications companies.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The Director of All American Telecom, Inc. is Thomas E. Biddix. Christina B. Sutch, Esquire serves as Secretary. Please see attached organizational chart listing the other telecommunication companies where Mr. Biddix and Ms. Sutch hold office.

REQUEST 13 Provide an example of a typical All American residential and business customer bill. What is the average residential bill in Kentucky?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Because the company has not yet begun providing service, All American telecom does not have a sample bill to supply. All American intends to charge \$34.50 plus tax for home phone service. LifeLine customers will receive the monthly LifeLine credit of \$13.50 towards this charge.

REQUEST 14 Will All American seek toll limitation service reimbursement from Universal Service Administrative Company ("USAC) if granted ETC status? If yes, provide a detailed list of the incremental costs it will claim, along with a detailed description to support the amounts to be claimed.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American will seek toll limitation service ("TLS") reimbursement from USAC. The onetime non recurring charge ("NRC") is \$8.50 and the monthly recurring charge ("MRC") is \$4.50. All American will be charged by its long distance provider a \$7.50 NRC and a \$4.99 MRC from the provider of TLS.

REQUEST 15 Will All American seek Link-Up reimbursement from USAC if granted ETC status? If yes, list the amount per customer All American would be claiming.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American's customary connection charge is \$60.00. If granted ETC status, All American would seek a \$30.00 per customer reimbursement for each qualified Link Up customer.

REQUEST 16 Will All American seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer All American would be claiming.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American will seek LifeLine reimbursement from USAC if granted ETC status. All American will claim a \$10.00 reimbursement for each qualified LifeLine customer.

REQUEST 17 Will All American seek Lifeline reimbursement from the Kentucky Universal Service Fund if granted ETC status? If yes, list the amount per customer All American would be claiming.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: If granted ETC status All American will not seek LifeLine reimbursement initially. All American will offer LifeLine customers a \$3.50 company credit each month in order to equal the maximum allowable benefit to them.

REQUEST 18 Are all All American's offerings bundled packages? Will All American provide the \$13.50 Lifeline discount to any bundle a customer chooses?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, all the packages offered to customers are bundled packages. All American will provide the \$13.50 LifeLine discount to any bundled package the customer chooses.

REQUEST 19 Does All American maintain separate books/general ledgers for each state in which it operates? Where are the books/general ledgers for Kentucky customers maintained? Provide the physical address, office phone number and name and title of employee responsible for maintaining those books/ledgers.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, All American does not maintain separate books/general ledgers for each state in which it operates. The books are maintained at 6905 N. Wickham Road, Suite 403, Melbourne, FL 32940. The books are maintained by the management company of All American. The management company is Associated Telecommunications Management Services, LLC ("ATMS"). The employee responsible for the All American books/general ledgers is Viddia Ramdhanie, Corporate Accountant and can be reached at (321) 373-1281.

REQUEST 20 Provide the number of requests for service from potential customers in Kentucky that were unfulfilled by All American in the previous calendar year.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Not applicable, All American did not have any customers in Kentucky in the previous calendar year.

REQUEST 21 Provide the address (URL) to the All American website, if there is one.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Currently the All American website is under construction. The address reserved for the inactive website is www.allamericantelecom.com.

REQUEST 22 What recurring and nonrecurring costs will a new Lifeline customer incur from becoming an All American customer over the period of a year?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The customary charge for the onetime non recurring connection fee is \$60.00 but with the Link Up credit of \$30.00 the customer will only pay a nonrecurring charge of \$30.00. The customer will be charged \$34.49 monthly for service but with the LifeLine credit of \$10.00 and the company promotional credit of \$3.50 they will pay \$19.99 per month plus tax. This equals \$269.88 the customer will incur over the course of a year.

REQUEST 23 Provide any resale or commercial agreements you currently have in Kentucky with other telecommunications carriers and include signed evidence of the agreements, along with invoices detailing both UNE and resale charges.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Please see attached executed AT&T wholesale agreement which is also on file with the commission. All American is not providing service at this time therefore there are no invoices to provide.

REQUEST 24 Provide a description of the process by which All American orders a 47 U.S.C. § 251 loop and commingles it with 47 U.S.C. § 271 elements to provide service. Provide copies of orders or contracts that show the process.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Whether through its current interconnection agreement on file at the Commission or any supplemental or successor agreement, All American intends to order Section 251 loops commingled with Section 271 elements as provided by federal law as explicated by the Commission. In its December 12, 2007 Order in Case No. 2004-00427,¹ the Commission conclusively determined that the so-called commercial agreements offered in Kentucky by AT&T-Kentucky to CLECs (such as that offered to All American) provide access to “facilities,” including network elements required by § 271(c)(2)(B), the competitive checklist requiring RBOCs to provide

¹ *In the Matter of Petition of BellSouth Telecommunications, Inc. to Establish Generic Docket to consider Amendments to Interconnection agreements Resulting from Changes of Law* (Final Order dated Dec. 12, 2007).

UNEs.² The Commission found that AT&T's commercial agreements fulfill AT&T-Kentucky's Section 271 obligations to continue providing those network elements that are no longer required to be provided under Section 251. Loops, of course, continue to be required by Section 251; and, as the Commission's reasoning with regard to whether network elements are supplied pursuant to AT&T's commercial agreements applies to an ETC analysis just as surely as it applies to a Section 271 compliance analysis, it necessarily follows that All American's commercial agreement provides for Section 251 loops to be provided in combination with Section 271 switches. Accordingly, when it orders under the agreement, the Applicant uses UNEs in its network³ and satisfies the requirement set forth in Section 214(e)(1)(A).

REQUEST 25 As a condition of receiving local service, are All American residential customers required to subscribe to All American long-distance services?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, the customers are not required to subscribe to All American's long distance service. However, the customer will have several options made available to them for long distance service through All American. The customer can opt for 240 free long distance minutes wherein they are required to call into an 800 number enter in an access code then dial the ten-digit number. The customer also has the option of unlimited access to 1+ dial. If the customer opts for the 1+ calling a deposit is required. The customers also have access to toll blocking and toll limitation. Pursuant to 47 C.F.R. 54.101(a)(9), toll restriction is provided at no charge. Due to the nature of the customer base, low income subscribers, the majority if not all of the customers opt for the 240 free long distance minutes.

² "There can be no mistake that 47 U.S.C. § 271(c)(1)(A) requires AT&T Kentucky to enter into "binding agreements that have been approved under Section 252 of this title . . . Moreover, pursuant to 47 U.S.C. § 271(c)(2)(A), these very agreements regarding access and interconnection must also include each element of the competitive checklist." Case No. 2004-00427, Order (December 12, 2007) at pp. 6-7. The Commission further determined that the rates for these *network elements* are to be market based. *Id.* at p. 11 (emphasis added).

³ See *Qwest Corp. v. Pub. Util. Comm'n*, 479 F.3d 1184 (10th Cir. 2007) (agreements relating to mass market switching and shared transport are agreements for network elements, even if provided under Section 271).

REQUEST 26 Describe All American's local usage plans pursuant to 47 C.F.R. § 54.101(a)(2). If phone service is offered in a bundled package, describe and enumerate the wireline local component (charge for local phone service) on which universal service compensation would be based.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The local usage All American offers is figured into the package price offered to all customers. Once All American is granted ETC status the LifeLine credit will be passed directly to the qualified customers.

REQUEST 27 Does All American understand that any resold Lifeline or Link-Up service purchased through another carrier cannot be claimed by All American for reimbursement from USAC?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American is aware that any resold LifeLine and/or Link Up service purchased through another carrier cannot be claimed for reimbursement from USAC.

REQUEST 28 Provide the name of the person (with business title) and/or entity (with business address) that will be filing the Form 497 with USAC if All American obtains ETC status.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The management company of All American, Associated Telecommunications Management Services, LLC ("ATMS") will prepare the 497 for All American if granted ETC status. The IT department has procedures in place to ensure accuracy of data prior to populating the form for All American

REQUEST 29 Does All American provide service to its customers via a prepaid service? If so, what percentage of its customers receives their service via a prepaid service?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American does not have any customers at this time but the business model in place for All American is based on a prepaid platform geared towards the under-served lower income end user.

REQUEST 30 Provide All American's purpose for requesting ETC status in Kentucky. What does the company hope to achieve? Why not just purchase resale Lifeline access lines from your underlying carrier if the purpose of ETC designation is solely to provide Lifeline and Link-Up?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American's purpose for requesting ETC status in Kentucky is to make more eligible consumers aware of the Lifeline and Link-Up programs, consistent with the objectives announced by Governor Beshear and Chairman Armstrong on September 13, 2010, when they issued a joint press release noting that "there are many eligible Kentuckians who do not participate in the program." That announcement, made during "Lifeline Awareness Week", underscores the FCC data cited by All American in its Petition. In addition, there are additional benefits available to CLECs that are ETC designated that are not available to non ETC companies. The purpose of All American is to provide Low cost affordable home phone service to the customers that qualify for the Lifeline /Link up program. There are additional subsidies available to ETC designated companies that All American will pass down to the customer. If granted ETC designation All American would be able to offer the maximum allowable full discount afforded the low income end user.

REQUEST 31 Have any owners, officers, or managers of All American been involved in any bankruptcy proceedings? If so, provide details as to the name of the person, the date on which the petition was filed, the case number and the name of the federal court district where the petition was filed.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, none of the owners, officers, or managers of All American have been involved in bankruptcy proceedings.

REQUEST 32 Have any owners, officers, or managers of All American been charged or convicted of a felony criminal offense during the last 10 years (either state or federal)? If so, provide details as to the name of the person, the dates of each charge and the name of the state or the federal court district where the charges or convictions occurred.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, no owners, officers or managers of All American have been charged or convicted of a criminal offense during the last 10 years.

REQUEST 33 Identify any civil litigation in which an All American owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness within the last 10 years.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Please see attached Exhibit "A".

REQUEST 34 Are customers who reconnect service with the company required to pay the past-due bill and a reconnection fee prior to receiving service? Are Lifeline customers allowed to pay past-due amounts over time? If so, describe the terms of such payments. Are Lifeline customers charged a reconnection fee?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Due to All American being a prepaid service provider past due bills would not be typical. Customers who reconnect service, including Lifeline customers, will be charged for a reconnection fee prior to receiving service.

REQUEST 35 Does All American use agents or other retailers to market and sell its service in Kentucky? Provide a list.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Not applicable, All American has not begun marketing to customers to date but once the marketing efforts begin All American intends to directly market to the end user.

REQUEST 36 Describe the process that All American intends to use to sign up customers for Lifeline. Will All American verify the customer's eligibility in the designated programs?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: During the sales process the agent will verify the eligibility with the customer. The customer is asked to fax or mail the LifeLine form within 7 days of initiating an account along with their government award letter certifying eligibility. Customers have several options in obtaining the form. The form will be available from All American online, via fax or mail. Upon initiating the account set up process All American will send out a Welcome letter that reiterates to the customer the necessity of the receipt of the self certification form in order to qualify them for this service.

REQUEST 37 Will All American be willing to advertise Lifeline and Link-Up availability in other languages besides English? If yes, name the other languages.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Upon a finding of actual demand All American is willing to advertise in Spanish to broaden the consumer base and ensure more of the eligible consumer base is aware of the advantages they are qualified for.

REQUEST 38 Does All American have any telecommunications facilities used to provide local exchange service? If so, give a description and location.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American does not currently own, operate, or provide service in the State of Kentucky through the use of its own facilities. Current plans call for All American to provide service to its end users through resale, and to lease switched port/loop combination UNEs.

REQUEST 39 Will All American use any subcontractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and physical address.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American will utilize Telecom Service Center, an inbound call center located at 4050 Riomar, Rockledge, FL and Benson inbound call center in San Salvador, El Salvador.

REQUEST 40 On page 7 of the application, All American states that "[the FCC has concluded that even pure resellers may qualify as an ETC and properly use universal service support for the purposes for which it was intended by offering reduced price Lifeline Service." Why did All American include this comment in its application? Does All American propose not to meet the facilities-based requirements under 47 U.S.C. § 214(e)(1)(a)?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, All American intends to meet the facilities based requirements under 47 U.S.C. § 214(e)(1)(a) through leased switched port/loop combination UNE's. The statement was included in the application to underscore the FCC's policy determination that a "facilities" requirement is largely irrelevant when a carrier is not seeking high cost funding and seeks only to participate in a federal program where support follows the customer, preventing any possibility of double recovery.

REQUEST 41 On page 9 of the application, All American states that, as of December 31, 2006, fewer than 20 percent of consumers eligible for Lifeline services in Kentucky were being provided such services. Does All American have any more recent statistics? If yes, provide the name of the source of those statistics and the date of the publication of those statistics.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The current statistics issued by USAC can be reviewed on their website, <http://www.usac.org/li/about/participation-rate-information.aspx>. The 2009 estimate is consistent with the previous finding in that 20% of the consumers eligible for LifeLine service we being provided service.

REQUEST 42 On page 9 of the application, All American states that it is willing to accept Carrier of Last Resort obligations throughout the universal service areas in which All American is designated an ETC by the Commission. Provide details of how All American would accomplish Carrier of Last Resort obligations.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: In the unlikely event that AT&T no longer provides service in the designated service area, All American would certainly enter into an agreement with the carrier that purchases AT&T's assets, or with the competitive carrier that caused AT&T to abandon its service territory, and provide service as necessary to all customers who request it.

REQUEST 43 On page 9 of the application, All American states that it will provide equal access to interexchange service. Does All American offer pre-subscription to other interexchange carriers?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: No, All American will not offer pre-subscription to other interexchange carriers.

REQUEST 44 All American is not currently registered as a long-distance carrier in Kentucky. Does All American intend to provide long-distance service and does All American intend to file a tariff?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American does intend to provide long-distance service and will file a long distance tariff in Kentucky. All American is a pre-paid home telephone service provider. Each qualified LifeLine customer will receive 240 free long distance minutes a month. The customer is given an 800 number and an access code. To make a long distance call the customer will call the 800 number, enter the access code then dial the ten-digit long distance number.

REQUEST 45 All American's tariff states: "The Company's service cannot be used to access interexchange carriers for interLATA, intraLATA, interstate, or international calling or access caller-paid information services (e.g., 900, 976). All 1+, 0+, 0-, and other numbers used for caller-paid services will be blocked by the Company through the underlying carrier's switch." On page 6 of the application, All American states that it provides long-distance service to its customers. Explain the discrepancy.

Responsible Party: Thomas E. Biddix, Director

RESPONSE: There is no discrepancy, presently All American is not registered to provide long-distance service in Kentucky. The tariff on file reflects only local exchange service. All American does intend to file a long distance tariff.

REQUEST 46 Does All American understand that Kentucky allows consumers to qualify for Lifeline only under certain income guidelines?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: Yes, All American is aware Kentucky allows customers to qualify for LifeLine only under certain income guidelines.

REQUEST 47 Kentucky currently requires that all ETCs perform an audit of all its customers receiving Lifeline benefits. Each customer must provide proof of eligibility. Does All American agree to audit all Lifeline customers each year rather than conduct a yearly audit of only a sample of customers?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: All American will agree to audit its own Lifeline customers in compliance with any Commission regulation applicable to and applied equally to all ETCs, including incumbent providers. All American acknowledges that its own compliance is subject to audit by the Commission itself.

REQUEST 48 On June 15, 2010, All American notified the Commission that it is transferring control to All American Acquisition Group, LLC, which is 100 per cent owned by Associated Telecommunications Management Services, LLC (“ATMS”). Provide a corporate structure to ATMS and the officers and all ownership of ATMS.

Responsible Party: Thomas E. Biddix, Director

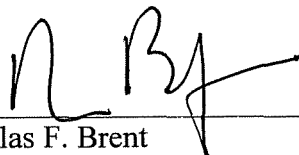
RESPONSE: Please see attached organizational chart of ATMS and its subsidiaries

REQUEST 49 All American stated in the June 15, 2010 notice that the transaction would allow All American to expand its telecommunications infrastructure. What telecommunications infrastructure does All American currently own and what are its proposed plans to expand?

Responsible Party: Thomas E. Biddix, Director

RESPONSE: The reference to infrastructure included in the June 15, 2010 notice was in error. All American does not seek High Cost Support from USAC. With the transaction, All American gained the experience and knowledge of the management company along with the access to greater resources. This allows All American to better serve the end user.

Dated: November 2, 2010

By 

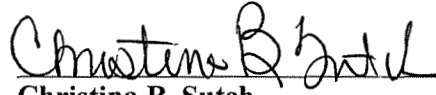
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Lance J. M. Steinhart
Lance J. M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
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VERIFICATION

STATE OF FLORIDA)
) SS:
COUNTY OF BREVARD)

The undersigned, Christina B. Sutch, being duly sworn, deposes and says that she is the Secretary for All American Telecom, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

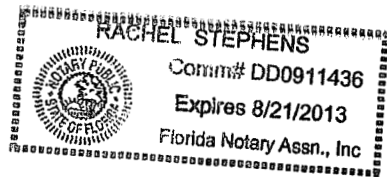

Christina B. Sutch
Secretary

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 28 day of September, 2010.

Personally Known


Notary Public (SEAL)

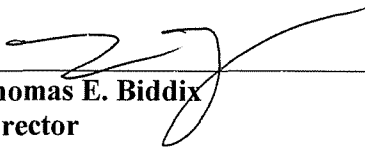
My Commission Expires:
Aug. 21, 2013




VERIFICATION

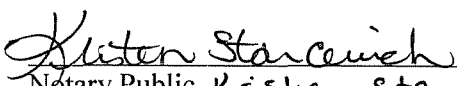
STATE OF FLORIDA)
) SS:
COUNTY OF BREVARD)

The undersigned, Thomas E. Biddix, being duly sworn, deposes and says that he is the Director for All American Telecom, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.


Thomas E. Biddix
Director

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of OCTOBER, 2010.

NOTARY PUBLIC-STATE OF FLORIDA
 Kristen Suzanne Starcewich
Commission # EE008534
Expires: JUNE 24, 2011
BONDED THRU ATLANTIC BONDING CO., INC.

 (SEAL)
Notary Public Kristen Starcewich

My Commission Expires:
June 24, 2011

Exhibit "A"

CHRISTINA B. SUTCH IS A MEMBER OF THE FLORIDA BAR AND HAS PROVIDED THE INFORMATION CONTAINED HEREIN TO THE BEST OF HER RECOLLECTION.

RICHARD E. TORPY VS. ZIES WIDERMAN SUTCH & MALEK, P.L., G. Philip J. Zies, Scott D. Widerman, Christina B. Sutch and Mark R. Malek, Case No. 05-2008-CA-013375-XXXX-XX, in the 18th Judicial Circuit, Brevard County, Florida.

WILLIAM RUSSELL V. ZIES WIDERMAN SUTCH & MALEK, G. Philip J. Zies, Scott D. Widerman, Christina B. Sutch and Mark R. Malek, 05-2008-CA-029329-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

THOMAS E. BIDDIX HAS PROVIDED THE INFORMATION CONTAINED HEREIN TO THE BEST OF HIS RECOLLECTION.

Laederal Medical v. EMSUSA, Inc, Emergency Medical Supply, Thomas A. Biddix, Stacey Biddix, Case. No 05-2007-CA-012856-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

Triple, Inc., and Tricare Medical Company, Ltd., v. Strategix, LLC; Thomas E. Biddix; Stacey D. Biddix, and Emergency Medical Supply, Inc., d/b/a EMS, USA. Case No. 08-CI-147 (Nelson Circuit Court, KY) same case in Florida 05-2008-CA-047913-XXXX-XX,, in the 18th Judicial Circuit, Brevard County, Florida.

Descent Control Systems v. Strategix, LLC, Stacey Biddix, Steven B. Ostrowski, Thomas E. Biddix, case 2:09-cv-00420-TS, U.S. District Court, Salt Lake City, Utah.

Dial Plumbing Air Conditioning, Inc., v. Stacy D. Biddix, Thomas E. Biddix, Case No 05-2007-SC-029406-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

Custom Docks Marine Contractors, Inc., v. Stacey Danielle Biddix, Thomas E. Biddix, Case No., 05-2008-007308-XXXX-XX, in the 18th Judicial Circuit, Brevard County, Florida.

Greg Kirschner v., Thomas E. Biddix Trustee, Thomas Biddix, Lansing Island Homeowners Association, Inc., Thomas E. Biddix Revocable Trust, United States of America, Case No., 05-2008-CA-008653-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

Citimortgage, Inc., v. Tortoise Island Homeowners Association, Inc., Mortgage Electronic Registration Systems, Inc., John Doe Jane Doe, Custom Docks Marine Contractors, Inc., Thomas E. Biddix, Stacy D. Biddix, Stacey D. Biddix, Case No. 05-2008-CA-024803-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

745 Special Assets, LLC v. Thomas E. Biddix Trust, Thomas E. Biddix, Stacey Biddix, Case No., 05-2008-CA-035567-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

American Express Bank FSB v. Strategix, LLC, Thomas Biddix, John Biddix, Case No. 05-2008-CA-046588-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.

Wachovia Bank, N.A. v. John P. Biddix, Thomas E. Biddix, Case No. 05-2003-CA-053437-XXXX-XX, , in the 18th Judicial Circuit, Brevard County, Florida.