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March 21, 2011

RECEIVED

MAR 23 2011

PUBLIC SERVICE
COMMISSION

Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Re: Investigation of LifeConnex Telecom, LLC for Continuation as an Eligible
Telecommunications Carrier in the Commonwealth of Kentucky
Case No. 2011-00045

Dear Mr. DeRouen:

Enclosed please find an original and ten copies of the Response of LifeConnex Telecom, LLC to the First Data Request of Commission Staff in the above referenced matter.

Please indicate receipt of this filing by placing your file stamp on the extra copy and returning to me via the enclosed self-addressed postage paid envelope.

Sincerely yours,

Douglas F. Brent

DFB:ec
Enclosures
cc: Henry Walker

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION OF LIFECONNEX TELECOM,)	
LLC FOR CONTINUATION AS AN ELIGIBLE)	CASE NO.
TELECOMMUNICATIONS CARRIER IN THE)	2011-00045
COMMONWEALTH OF KENTUCKY)	

RESPONSE OF LIFECONNEX TELECOM, LLC
TO FIRST DATA REQUEST OF COMMISSION STAFF

REQUEST 1. Explain the reasons for the cancellation of the interconnection agreement between Lifeconnex and AT&T Kentucky.

RESPONSIBLE PARTY: Paul T. Watson

RESPONSE: The parties have had a protracted billing dispute which is the subject of another proceeding before this Commission, Case No. 2010-00026. As the Commission is aware from filings in that proceeding, on July 23, 2010 AT&T Kentucky wrote to the Commission and stated it would disconnect LifeConnex for non-payment.

REQUEST 2. Provide the number of customers Lifeconnex is currently serving in Kentucky and the method by which it is providing service to those customers.

RESPONSIBLE PARTY: Paul T. Watson

RESPONSE: LifeConnex serves approximately 468 residential customers at this time; most are Lifeline customers. The number is diminishing each month through attrition. Since the termination of the AT&T interconnection agreement last year, LifeConnex has suspended all solicitation and marketing efforts in Kentucky but has made arrangements to obtain wholesale service through another local provider in order to continue serving its remaining customers and to avoid disconnection of their service.

REQUEST 3. If Lifeconnex is serving any customers in Kentucky, are any of those customers Lifeline customers?

RESPONSIBLE PARTY: Paul T. Watson

RESPONSE: Yes.

REQUEST 4. If LifeConnex is serving any Lifeline customers in Kentucky, explain the method by which it is providing service to those Lifeline customers.

RESPONSIBLE PARTY: Paul T. Watson

RESPONSE: LifeConnex has a wholesale arrangement with another local service provider.

REQUEST 5. LifeConnex shall also explain to the Commission whether it intends to continue to be an ETC and how it will fulfill those duties on a going-forward basis.

RESPONSIBLE PARTY: Paul T. Watson

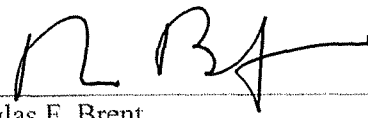
RESPONSE: LifeConnex suspended all solicitation and marketing efforts in Kentucky in August 2010. LifeConnex continues to provide Lifeline service to its current base of Kentucky Lifeline customers, consistent with the Commission's policy guidance that all ETCs should be judicious in any decision to relinquish the right to provide service to low-income Kentuckians. *See generally New Cingular Wireless, Case No. 2008-00077 (July 15, 2009).*

REQUEST 6. Lifeconnex shall explain to the Commission whether it intends to continue to be a communications provider in Kentucky and how it will provide service on a going-forward basis.

RESPONSIBLE PARTY: Paul T. Watson

RESPONSE: Lifeconnex intends to provide service to its existing customer base using the current serving arrangement for the foreseeable future.

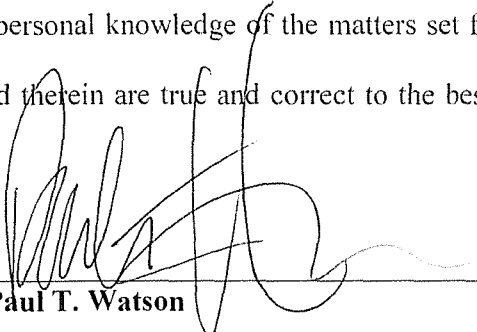
Dated: March 21, 2011

By 
Douglas F. Brent
STOLL KEENON OGDEN PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
(502) 333-6000

VERIFICATION

STATE OF FLORIDA)
) **SS:**
COUNTY OF BREVARD)

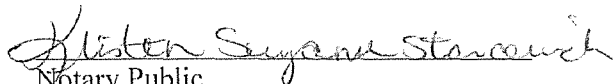
The undersigned, Paul T. Watson, being duly sworn, deposes and says he is Chief Operations Officer of Associated Telecommunications Management Services, LLC, parent company of Lifeconnex Telecom, LLC, that he has personal knowledge of the matters set forth in the foregoing responses and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Paul T. Watson

Subscribed and sworn to before me, a Notary Public in and before said County and State,
this 21st day of March, 2011.

(SEAL) 



Notary Public

My Commission Expires:

6/24/2015