

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF CAPITAL COMMUNICATIONS)
CONSULTANTS, INC. FOR DESIGNATION)
AS AN ELIGIBLE TELECOMMUNICATIONS)
CARRIER IN THE COMMONWEALTH) CASE NO. 2011-00029
OF KENTUCKY)

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO CAPITAL COMMUNICATIONS CONSULTANTS, INC.

Capital Communications Consultants, Inc ("Capital Communications"), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due on or before August 26, 2011. Responses to requests for information shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Capital Communications shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or,

though correct when made, is now incorrect in any material respect. For any request to which Capital Communications fails or refuses to furnish all or part of the requested information, Capital Communications shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. If the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations.

1. In the Commission Staff's First Request for Information, the following question was asked:

1. Provide Capital Communications' purpose for requesting Eligible Telecommunications Carrier ("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?

Capital Communications failed to completely respond to the inquiry. Provide a complete answer to all parts of the inquiry.

2. In the Commission Staff's First Request for Information, the following question was asked:

17. Provide an example of a typical Capital Communications residential and business customer bill. What is the average residential bill in Kentucky?

Capital Communications provided a copy of a Georgia bill as Exhibit C. The rates on the bill do not match Capital Communications' current tariff. Is it Capital

Communications' intent to provide service at the same rates and charges as in Georgia?

3. In the Commission Staff's First Request for Information, the following question was asked:

18. What recurring and nonrecurring costs will a new Lifeline customer incur from becoming a Capital Communications customer over the period of a year?

Provide a tariff reference for the rates listed.

4. In the Commission Staff's First Request for Information, the following question was asked:

19. Provide a proposed tariff that details the Company's proposed Lifeline offering.

The Tariff provided in response to this question does not have a section detailing the Company's proposed Lifeline offering. Provide a proposed tariff section that details the Company's proposed Lifeline offering.

5. In the Commission Staff's First Request for Information, the following question was asked:

22. Describe Capital Communications' 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) for which universal service compensation would be based on.

Capital Communications failed to completely respond to the inquiry. Capital Communications did not enumerate the amount of local usage allowed under the plan. Provide a complete response to the inquiry.

6. In the Commission Staff's First Request for Information, the following question was asked:

29. Will Capital Communications seek toll limitation service reimbursement from Universal Service Administrative Company ("USAC") if granted ETC status? If so, provide a detailed list of the incremental costs it will be claiming, along with a detailed description to support the amounts to be claimed.

Capital Communications failed to completely respond to the inquiry. Capital Communications did not provide a detailed list of the incremental costs it will be claiming, along with a detailed description to support the amounts to be claimed. Provide the information.

7. In the Commission Staff's First Request for Information, the following question was asked:

30. Will Capital Communications seek Link-Up reimbursement from USAC if granted ETC status? If so, list the amount per customer Capital Communications would be claiming.

Capital Communications stated in its response that it would be claiming up to \$30, or the highest amount allowable. In Section 7.2.4 of Capital Communications' Tariff, it indicates that Capital Communications will charge customers in the AT&T area a \$42 nonrecurring installation charge, and a \$60 nonrecurring Activation Charge to all customers in the AT&T area, including Lifeline. Explain why the customer in the AT&T area will be charged an Activation Charge and customers in other areas of the state will not be charged the Activation Charge.

8. In the Commission Staff's First Request for Information, the following question was asked:

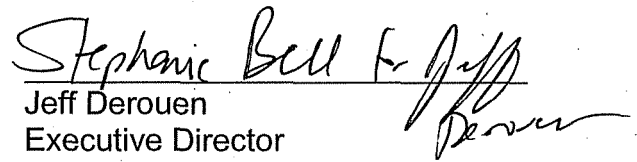
36. Provide a description of Capital Communications' corporate structure, with both names and titles. Also provide a list of Capital Communications' owners or corporate officers and indicate if any are also owners, corporate

officers, or employees of any other telecommunications companies and provide a vitae for each listed.

Capital Communications failed to completely respond to the inquiry. Provide a complete response to the inquiry.

9. The tariff provided indicates that the charge for local service in the AT&T service area will be between \$14.10 and \$18.40. See Section 7.2.1. Explain why Capital Communications is proposing to charge Lifeline customers \$33.49. (See response to question 22.)

10. The Kentucky Secretary of State website indicates that Capital Communications is in Bad Standing with the State. Provide an explanation.


Jeff Derouen
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DATED: JUL 14 2011

cc: Parties of Record

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