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DOUGLAS F. BRENT
502-568-5734
douglas.brent@skofirm.com

HAND DELIVERY

RECEIVED

July 21, 2006

JUL 21 2006

Ms. Elizabeth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

PUBLIC SERVICE
COMMISSION

***RE: Case No. 2005-00455, dPiTeleconnect v. BellSouth Telecommunications
Emergency Request to Prevent Interruption of Service***

Dear Ms. O'Donnell:

We are local counsel to dPi Teleconnect ("dPi"), a telecommunications reseller and complainant in the referenced proceeding. This complaint case is currently subject to an abeyance order issued at the joint request of BellSouth and dPi.

Despite the fact that this Commission has had no hearing on the matters raised in the complaint, BellSouth is threatening that tomorrow, July 22, 2006, it will interrupt dPi's access to critical systems dPi needs to provision service for its end users. BellSouth is also threatening to cut off service to dPi's end users in early August. Accordingly, we are asking the Commission to review and act on the enclosed emergency motion on an expedited basis.

Please stamp and return one copy of this letter to our office.

Sincerely yours,

Douglas F. Brent

cc: Mary K. Keyer, BellSouth (via email)
Joan Coleman
Virginia Smith, Consumer Services

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DPI TELECONNECT, L.L.C.)	
)	
COMPLAINANT)	
VS.)	CASE NO. 2005-00455
)	
BELLSOUTH TELECOMMUNICATIONS, INC.)	
)	
DEFENDANT)	

dPi's MOTION FOR EMERGENCY RELIEF

EXECUTIVE SUMMARY

1. dPi Teleconnect, LLC ("dPi"), by its undersigned counsel and pursuant to KRS 278.260 and 807 KAR 5:001, Section 11, appeals to the Commission for an order directing Bellsouth to stay all end-user affecting collections activity relating to the amounts in controversy in this case until the litigation has run its course. The Commission should do so because this dispute is still pending before the Commission and currently subject to a Commission order holding it in abeyance, and because Bellsouth agreed prior the commencement of this case that it would in fact hold off on collections activity while the dispute was pending. Moreover, dPi is current in its payments to BellSouth other than for disputed amounts.

BACKGROUND/FACTS

2. This case stems from BellSouth's promotional practices, which in effect require CLECs like dPi to overpay for services which BellSouth offers at promotional pricing, and then seek credits to recover the overpayments. In this case, when BellSouth refused to timely process dPi's credit requests (taking months instead of days), dPi withheld payment from its bill in the amount of

the credits it expected and was led to expect by BellSouth employees. On a business to business level, the parties agreed that BellSouth would not institute collections activity against dPi for amounts unpaid equal to the amounts of the credits applied for and in dispute while the dispute was pending.¹

3. On June 7, 2006, the North Carolina Commission entered its initial order in this case.

4. On or after July 10, 2006, dPi received a BellSouth collections letter dated July 7, 2006, seeking \$1,427,996.90 in amounts allegedly owed BellSouth. In the letter, BellSouth threatened to halt provisioning of dPi's order processing on July 22, 2006, one day from now. A copy of the letter is attached as Exhibit B. dPi's records reflect that no dPi payments are past due. In fact, the entire amount claimed "not paid" is tied to promotional credit amounts that have been in dispute and that are currently being litigated in the various BellSouth jurisdictions.

5. To be more particular, in 2004 dPi Teleconnect submitted \$1,415,297.31 in promotional disputes which remain unpaid by BellSouth, but which are the subject of litigation (with open docket numbers) in each BellSouth state, including this case. BellSouth has only credited dPi Teleconnect \$398,005.85 for the promotional disputes, leaving a balance of \$1,059,022.16 in dispute.

6. Assuming, for the sake of argument, BellSouth's number of \$1,427,996.90 to be correct, the \$1,427,996.90, less the \$1,059,022.16 in promotion related disputes, less the \$41,730.68 in general billing error disputes which BellSouth shows in its figures, results in a difference between what BellSouth claims is owed and what is disputed of \$327,244.08. However, BellSouth does not

¹ Attached as Exhibit A are various emails recognizing the existence of this agreement.

appear to have credited dPi's account with the roughly \$400,000 that dPi recently sent BellSouth.² In other words, after the disputes are accounted for, all bills have been paid.

7. BellSouth earlier agreed not to seek collection of these amounts until final decisions had been reached in these cases, and put dPi's account on a "manual override" so as to quash this kind of continued collections activity.

8. Now, despite the fact that the dispute is still pending, as evidenced by the filing of dPi's Motion for Reconsideration in North Carolina,³ and that Commission's solicitation of comments from BellSouth and Staff on same, BellSouth is taking the position that the money must be paid immediately on the grounds that the North Carolina Commission's initial June 7 order in this case is "final and effective" and controls the outcome in all BellSouth states.

ANALYSIS: dPi IS ENTITLED TO EMERGENCY RELIEF

9. dPi is entitled to emergency interim relief in this case because:

1. dPi has a substantial likelihood of success on the merits;
2. It faces a substantial threat of irreparable injury without the relief;
3. The threatened injury to dPi outweighs any threatened harm to BellSouth from a preservation of the status quo; and
4. Interim relief is necessary to prevent the threatened harm.

A. dPi has a substantial likelihood of success on the merits

10. As noted earlier, BellSouth agreed to postpone further collections activity related to the amounts in dispute "while the dispute was pending." It is irrefutable that the dispute is still pending: the North Carolina Commission is currently evaluating dPi's Motion for Reconsideration,

² The recent payments are set out in Exhibit C.

³ The motion was filed July 6, 2006 in NCUC Docket No. P-55, Sub 1577.

and has asked Staff and Bellsouth for comments. Moreover, the Kentucky Commission has not entered any order which could remotely be called a final order in this particular case. The Commission's rules provide that when a customer is current on undisputed amounts there can be no interruption of service while a dispute is pending. 807 KAR 5:001, Section 11.

11. Consequently, with regards to enforcement of the agreement to not engage in collections activity relating to the amounts in dispute while the dispute is pending, dPi has a substantial likelihood of prevailing.

B. dPi faces imminent harm if relief is not granted

12. BellSouth's demand letter clearly threatens suspension and termination of service if dPi does not immediately meet BellSouth's arbitrary and unreasonable deadline for paying the requested amounts. *See* Exhibit B. Any such suspension or termination would seriously compromise dPi's ability to process new customer orders, change orders or orders for suspension or restoration of service. dPi's customers would not be provided telecommunications services at the rates and quality of service ordinarily provided by dPi, which would have a serious impact on dPi's good will with its customers -- especially with those that have signed up but face indefinite delay in getting their service turned on. Furthermore, dPi serves credit challenged customers, and experiences a very high "churn" rate: each month, many, many customers are disconnected, and replaced by new ones who are sign up in response to dPi's marketing. dPi must replace the customers it loses with new ones, or it will face increasing costs with rapidly decreasing revenues as it is forced to pay BellSouth for those lines it cannot disconnect, and cannot generate revenue from new customers that it cannot put online. dPi would quickly sustain irreparable damage and could be put out of business altogether.

13. In order to avoid the dire consequences of suspension of service order provisioning and to allow the parties' legitimate disputes regarding the ambiguous terms of the interconnection

agreement to proceed to hearing and decision on the merits, relief is needed. Specifically, the Commission should order BellSouth to cease and desist from its efforts to suspend order provisioning or otherwise affect dPi's service until this case is ultimately decided and all appeals/motions for reconsideration exhausted.

C. The threatened injury to dPi outweighs any threatened harm to BellSouth from preserving the status quo.

14. Maintaining the status quo will not harm BellSouth. dPi is current on its existing bills. BellSouth will not be harmed by continuing to provide provisioning to dPi for the duration of this dispute. As shown above, dPi, on the other hand, will quickly sustain irreparable damage if it is disconnected or otherwise unable to provision its customers' accounts and could be put out of business altogether.

D. Immediate relief is necessary; without it dPi faces wrongful and irreparably damaging suspension and termination.

15. An order preventing BellSouth from disconnecting dPi from critical systems is necessary because BellSouth has threatened to suspend or terminate dPi's provisioning unless dPi meets an arbitrary and unreasonable deadline for paying the deposit.

CONCLUSION AND PRAYER FOR RELIEF

Because this dispute is still pending and subject to an abeyance order issued by the Commission and because BellSouth agreed not to pursue collections actions relating to amounts connected with this dispute, dPi respectfully requests:

16. A temporary order be issued immediately that directs BellSouth to cease and desist from its threatened action to discontinue service order provisioning during the pendency of this proceeding and that this temporary order continue in full force and effect until such time as a ruling

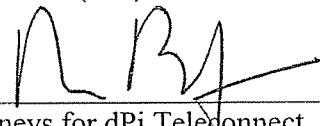
can be made after a full hearing may be held on this matter concerning the agreement not to pursue collections action during the pendency of the dispute; and

17. dPi be awarded any other and further legal and equitable relief to which it is entitled.

Respectfully submitted,

Christopher Malish (admitted *pro hac vice*)
Texas Bar No. 00791164
Foster Malish Blair & Cowan, L.L.P.
1403 West Sixth Street
Austin, Texas 78703
Telephone: (512) 476-8591
Facsimile: (512) 477-8657

Douglas F. Brent
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Telephone: (502) 333-6000

By: 
Attorneys for dPi Teleconnect, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this the 21st day of July 2006, served a true and correct copy of the foregoing to the following:

Mary K. Keyer
General Counsel -- Kentucky
BellSouth Telecommunications, Inc
601 West Chestnut Street, Room 407
Louisville, Kentucky 40202

Andrew Shore, Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375



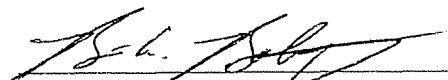
Douglas Brent

VERIFICATION

STATE OF TEXAS
COUNTY OF DALLAS

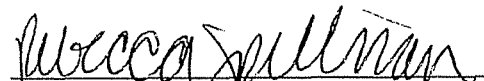
§
§

On this day, Brian Bolinger, Vice-President of Legal Affairs for dPi Teleconnect, L.L.C. ("dPi"), appeared before me, the undersigned notary public, and, after I administered an oath to him, upon his oath, said he had read dPi's Motion for Emergency Relief (Temporary Restraining Order and Temporary Injunction) against BellSouth Telecommunications, Inc., and the attachments thereto, and the factual assertions are within his personal knowledge, and are true and correct.



Brian Bolinger,
Vice-President of Legal Affairs for dPi
Teleconnect, L.L.C.

SWORN TO AND SUBSCRIBED before me by Brian Bolinger on the 20th day of July,
2006.



Notary Public in and for the State of Texas

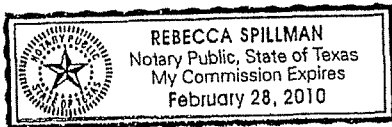



EXHIBIT A

Malish, Chris

From: Shore, Andrew [Andrew.Shore@BellSouth.COM]
Sent: Wednesday, July 19, 2006 10:08 AM
To: Malish, Chris; Ditta, Carmen; Edward L. Rankin III (Business Fax)
Cc: Bailey, Dwight; Mangina, Leisa G; Patterson, Gary D; BBolinger@dpiteleconnect.com
Subject: RE: Bellsouth dPI wrongful provisioning cut off

Chris,

This will respond to your correspondence below and follow-up on the other e-mails we have exchanged yesterday and today.

As you know, BellSouth's contract with dPi allows BellSouth to take specified actions if dPi fails to pay BellSouth for services rendered. There is no question that the services have been rendered. dPi claimed that it was entitled to certain promotional credits that would offset the amounts due BellSouth, and it filed complaints with several state commissions. We agreed that we would hold all but NC in abeyance pending the outcome in NC, and that the NC outcome would be applicable region wide. BellSouth further agreed that it would not enforce its contractual remedies while the dispute was pending. 

The NC Commission issued an Order in BellSouth's favor. That Order is final and effective. As you set forth dPi's position, dPi claims that it still does not have to pay and BellSouth should not enforce its contractual remedies for non-payment because the NC litigation is not complete. To the contrary, the NC order is effective.

BellSouth has sought to work cooperatively with dPi and we will, of course, continue to do so. We cannot, however, simply let a growing receivable go unpaid now that the NC Commission has ruled that we are entitled to the payments that dPi is wrongfully withholding. We are open to discussing this matter with dPi further and would much prefer to work this out between the parties. I understand that there is some disagreement as to the exact amount owed and am very hopeful that our respective clients can reconcile those figures.

I look forward to hearing from you and to hopefully resolving this issue without the need to ask state commissions to devote scarce resources to an issue that is clearly set forth in the parties' contract.

Andrew

-----Original Message-----

From: Malish, Chris [mailto:chrismalish@FOSTERMALISH.com]
Sent: Tuesday, July 18, 2006 1:16 PM
To: Shore, Andrew; Ditta, Carmen; Edward L. Rankin III (Business Fax)
Cc: Bailey, Dwight; Mangina, Leisa G; Patterson, Gary D; BBolinger@dpiteleconnect.com
Subject: Bellsouth dPI wrongful provisioning cut off

Dear Andrew:

Tried to call and left a couple of messages for you.

On or after July 10, dPi received a BellSouth collections letter dated July 7 seeking \$1,427,996.90 in amounts allegedly owed BellSouth, and threatening to terminate provisioning by July 22. Please see my letter, attached, for more details and supporting documents. There appears to be some kind of mistake here. Bellsouth previously agreed that it would not be seeking collections related to the amounts of these promotional disputes, and Bellsouth put some kind of "manual override" into its system to suppress this kind of collections activity. That "manual override" appears to have slipped off. Can we please get it reinstated by July 20, before dPi has to file for

A

emergency relief at the various PUCs to prevent dPi's provisioning from being wrongfully cut off?

I'm copying those at Bellsouth who might have some insight into this situation.

Chris Malish

Foster Malish Blair & Cowan, LLP

1403 West Sixth Street

Austin, Texas 78703

(512)476-8591/voice

(512)477-8657/fax

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This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you have received this message in error, you are hereby notified that we do not consent to any reading, dissemination, distribution or copying of this message. If you have received this communication in error, please notify the sender immediately and destroy the transmitted information.

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From: Lund, Steve [mailto:Steve.Lund@BellSouth.com]
Sent: Tuesday, December 21, 2004 10:23 AM
To: Bollinger, Brian
Cc: Seagle, Kristy; Mangina, Leisa G; Lund, Steve
Subject: RE: dPI Teleconnect Promotionals Submitted

Brian,

After talking with you on the phone today, I talked with Rubeye Haskins, who is the service rep that handles your account. She informed me that the letters are automatically generated to be sent out to customers with past due accounts, but that DPI Teleconnect had specific notes on their accounts not to treat or hold them until the \$50k in promotional disputes have been handled. Right now Kristy Seagle is currently review these charges and will get back with the Billing & Collections group.

Let me know if you have any other concerns while Leisa is out on vacation.

Thanks,
Steven Lund
205-714-7358

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential, proprietary, and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from all computers. 162

7/13/2006

Lisa Hinojosa

From: Bolinger, Brian [mailto:brian.bolinger@dpiteleconnect.com]
Sent: Thursday, July 13, 2006 1:59 PM
To: Malish, Chris
Subject: FW: dPi Teleconnect Promotionals Submitted

FYI

Brian A. Bolinger
Vice President of Legal Affairs
dPi Teleconnect, LLC
2997 LBJ Freeway, Suite 225
Dallas, TX 75234
(972) 488-5500 ext 4018

This message contains PRIVILEGED and CONFIDENTIAL information that is intended only for use by the named recipient. If you are not the named recipient, any disclosure, dissemination, or action based on the contents of this message is prohibited. In such case please notify us and destroy and delete all copies of this transmission.

-----Original Message-----

From: Lund, Steve [mailto:Steve.Lund@BellSouth.com]
Sent: Friday, January 21, 2005 8:22 AM
To: Bolinger, Brian
Cc: steve.lund@bellsouth.com
Subject: RE: dPi Teleconnect Promotional Submitted

Brian,

This was another automatic letter that was sent out. Your account is in manual override, which means dPi will not experience any interruptions in their service until further notice. I believe the promotions issue is still being investigated by Kristy Seagle.

Thanks,
Steven

-----Original Message-----

From: Bolinger, Brian [mailto:BBolinger@dpiteleconnect.com]
Sent: Thursday, January 20, 2005 11:36 AM
To: Lund, Steve; Bolinger, Brian
Cc: Mangina, Leisa G; Alagar, Maxine P
Subject: RE: dPi Teleconnect Promotional Submitted
Importance: High

Steve:

dPi Teleconnect has again received some demand letters. I believe that we now have approximately 670,000 in credits that we have applied for but have yet to receive. Please confirm that BellSouth has no intention of interrupting service to our customers or placing an embargo on dPi Teleconnect until this issue is resolved.

Thank you.

Brian A. Bolinger
Vice President Legal Affairs
dPi TeleConnect, LLC
2997 LBJ Freeway, Suite 225

7/13/2006

Dallas, Texas 75234
Telephone: 972-488-5500 x4018
Fax: 972-406-0193

-----Original Message-----

From: Lund, Steve [mailto:Steve.Lund@BellSouth.com]
Sent: Wednesday, November 24, 2004 11:52 AM
To: Bolinger, Brian
Cc: Leisa Mangina (Mangina, Leisa G); Lund, Steve; Maxine Alagar (Alagar, Maxine P)
Subject: RE: dPI Teleconnect Promotionals Submitted

Brian,

I have spoken to Leisa Mangina and let her know that we have received approx 550k in disputes, which will remove your accounts from any collections processes. If you have any further questions, please call me at 205-714-7358.

Thanks,
Steven

-----Original Message-----

From: Bolinger, Brian [mailto:BBolinger@dpiteleconnect.com]
Sent: Wednesday, November 24, 2004 11:30 AM
To: Lund, Steve
Subject: FW: dPI Teleconnect Promotionals Submitted
Importance: High

Steve:

In accordance with our conversation, here is all of the information that has been provided to BellSouth with regard to our promotional credits. All of the credits should have been applied to our account by now. I will give you a call shortly to discuss.

Thank you.

Brian A. Bolinger
Vice President Legal Affairs
dPI TeleConnect, LLC
2997 LBJ Freeway, Suite 225
Dallas, Texas 75234
Telephone: 972-488-5500 x4018
Fax: 972-406-0193

-----Original Message-----

From: processing [mailto:processing@lostkeytelecom.com]
Sent: Wednesday, November 24, 2004 11:22 AM
To: bbolinger@dpiteleconnect.com
Subject: Promotionals submitted

Here what you needed, Steve

Steve Watson
P.O. Box 34474
Pensacola, FL 32507
678.528.6692 (Office)
678.388.9866 (Fax)
888.259.6057 (Toll Free)
850.748.2344 (mobile)

swatson@lostkeytelecom.com

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EXHIBIT B



7/7/2006

DPI TELECONNECT, LLC
David B. Dorwart
President/CEO
2997 LBJ Freeway, Suite 225
Dallas, Texas 75234

OUR RECORDS INDICATE THAT AS OF 7/7/2006, WE HAVE NOT RECEIVED PAYMENT OF \$1,424,949.19 FOR DPI TELECONNECT LLC. IF PAYMENT OF THIS AMOUNT IS NOT RECEIVED BY 7/22/2006, REQUESTS FOR ADDITIONAL SERVICES WILL BE REFUSED. ALSO, PAYMENTS ARE EXPECTED FOR ANY CURRENT CHARGES THAT MAY BECOME PAST DUE BY 7/22/2006.

YOUR END USERS' SERVICE WILL BE INTERRUPTED UNLESS PAYMENT OF YOUR PAST DUE CHARGES IS RECEIVED BY 8/6/2006.

IF YOUR END USERS' SERVICE IS INTERRUPTED FOR NON-PAYMENT OF PAST DUE CHARGES, A RESTORAL FEE WILL APPLY FOR EACH END USER ACCOUNT UPON RESTORAL OF SERVICE. THIS MAY BE THE ONLY WRITTEN NOTIFICATION YOU RECEIVE. IN ADDITION, FURTHER NOTICE MAY NOT BE GIVEN BEFORE DISCONTINUING SERVICE IF A CHECK IS DISHONORED.

IF YOU HAVE PAID YOUR BILL SINCE THIS NOTICE WAS PREPARED PLEASE ACCEPT OUR THANKS AND DISREGARD THIS NOTICE.

IF YOU HAVE ANY QUESTIONS, PLEASE CALL 1-800-872-3116

Account Representative

du

CRIS/Oracle Aging Summary

7/20/06

Customer	BAN	Bill	Period	Correct	31T060	61T090	\$19T06	Dispatch Amount	Promo Credit	Total	Total Collectible
PI TELECONNECT LLC	305Q968453453	\$410.09	26	(243.45)	\$75.71	\$355.24		\$14.96	\$0.00	\$137.50	\$127.68
PI TELECONNECT LLC	561Q968453453	\$716.23	26	(110.53)	\$11.59	\$364.49		\$0.26	\$0.00	\$285.55	\$285.29
PI TELECONNECT LLC	904Q968453453	\$2,142.96	26	\$2,489.89	\$2,617.34	\$7,461.48		\$15.10	\$0.00	\$12,558.71	\$12,553.61
PI TELECONNECT LLC	706Q968453453	\$13,106.95	26	\$14,555.16	\$16,973.30	\$64,939.24		\$2,566.41	\$0.00	\$96,467.79	\$93,901.29
PI TELECONNECT LLC	770Q968453453	\$6,420.87	26	\$7,341.18	\$8,604.33	\$24,436.85		\$11.36	\$0.00	\$40,384.36	\$40,373.09
PI TELECONNECT LLC	502Q968453453	\$7,128.29	26	\$7,149.22	\$8,550.77	\$27,009.84		\$146.49	\$0.00	\$42,709.33	\$42,561.44
PI TELECONNECT LLC	318Q968453453	\$15,296.92	26	\$16,537.37	\$17,912.24	\$54,164.15		\$3,767.14	\$0.00	\$86,613.76	\$84,846.62
PI TELECONNECT LLC	601Q968453453	\$3,659.69	26	\$3,821.17	\$3,279.48	\$9,571.76		\$245.60	\$0.00	\$15,672.41	\$15,416.81
PI TELECONNECT LLC	704Q968453453	\$8,055.21	26	\$10,245.20	\$11,780.14	\$34,911.01		\$462.50	\$0.00	\$56,936.35	\$56,473.85
PI TELECONNECT LLC	803Q966453453	\$19,991.76	26	\$12,636.79	\$14,816.96	\$86,556.33		\$3,368.98	\$0.00	\$114,010.08	\$110,649.18
PI TELECONNECT LLC	770Q890888838	\$0.00	19	\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
PI TELECONNECT LLC	615Q888437437	\$73,318.39	8	\$24,331.98	\$28,831.78	\$142,115.68		\$11,969.02	\$7,116.10	\$195,279.44	\$181,194.32
PI TELECONNECT LLC	561Q888437437	\$4,795.56	8	\$2,387.66	\$4,404.27	\$15,539.99		\$168.09	\$436.41	\$8,164.42	\$7,762.34
PI TELECONNECT LLC	803Q888437437	\$12,471.60	8	\$13,792.20	\$14,613.62	\$306,588.73		\$243.15	\$436.41	\$135,081.55	\$134,401.99
PI TELECONNECT LLC	706Q888437437	\$5,191.40	8	\$4,065.73	\$4,338.87	\$15,930.61		\$171.51	\$959.74	\$24,935.21	\$23,803.96
PI TELECONNECT LLC	305Q888437437	\$387.25	8	\$291.35	\$203.82	\$0.00		\$326.26	\$0.00	\$495.17	\$168.91
PI TELECONNECT LLC	904Q888437437	\$5,627.72	8	\$5,908.74	\$7,936.85	\$43,126.66		\$286.70	\$656.72	\$56,972.25	\$56,028.83
PI TELECONNECT LLC	228Q888437437	\$5,016.88	8	\$5,139.03	\$5,808.64	\$19,243.58		\$241.89	\$824.08	\$30,191.25	\$29,125.28
PI TELECONNECT LLC	704Q888437437	\$40,265.52	8	\$38,359.73	\$48,386.57	\$267,572.36		\$4,386.93	\$3,944.55	\$354,278.66	\$345,947.18
PI TELECONNECT LLC	318Q897979979	\$7,045.49	19	\$8,531.19	\$1,743.17	\$47,747.66		\$0.00	\$1,177.54	\$58,022.82	\$56,844.48
PI TELECONNECT LLC	770Q888437437	(1.95)	8	\$0.00	\$0.00	\$0.00		\$0.00	\$0.00	\$0.00	\$0.00
PI TELECONNECT LLC	205Q888437437	\$8,022.08	8	\$7,939.98	\$10,269.33	\$36,417.15		\$205.79	\$920.06	\$54,626.46	\$53,500.61

This is not an official BellSouth document. If there is a conflict with this report, the BellSouth bill remains the official document.

1

7/2006

Customer	BAN	Bill Period	Current	31T060	61T090	91T120	Disputed Amount	Froms Credit	Total Outstanding	Total Collectible
PJ TELECONNECT LLC	502Q888437437	8	\$8,893.97	\$8,858.91	\$11,067.29	\$44,755.74	\$11,108.84	\$614.52	\$60,701.84	\$78,977.68
PJ TELECONNECT LC			\$186,362.48	\$192,421.53	\$228,799.46	\$1,053,632.89	\$29,786.82	\$11,817.81	\$1,466,553.82	\$1,724,949.19

Grand Total:

This is not an official BellSouth document. If there is a conflict with this report, the BellSouth bill remains the official document.

EXHIBIT C

RECENT PAYMENTS BY dpi

Showing date, BAN, and amount

7/11/06:

CK 75344	704Q968453453	\$27287.25
CK 75345	706Q888437437	\$2465.38
CK 75343	704Q888437437	\$70161.27
CK 75342	305Q968453453	\$410.09
	TOTAL	\$100323.99

6/27/06:

CK 75279	904Q968453453	\$3030.93
CK 75278	803Q966453453	\$12625.95
CK 75277	770Q968453453	\$7051.40
CK 75276	706Q968453453	\$29980.28
CK 75275	704Q968453453	\$11122.20
CK 75274	601Q968453453	\$3256.83
CK 75273	502Q968453453	\$10806.84
CK 75272	318Q968453453	\$4526.37
CK 75271	318Q897979979	\$26708.76
	TOTAL	\$109109.56

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CK 75013	205Q888437437	\$6620.77
CK 75014	228Q888437437	\$11000.70
CK 75015	305Q888437437	\$272.59
CK 75016	305Q968453453	\$559.96
CK 75017	318Q897979979	\$47557.64
CK 75018	318Q968453453	\$9138.71
CK 75019	502Q888437437	\$19155.46
CK 75020	502Q968453453	\$12996.09
CK 75021	561Q888437437	\$1003.77
CK 75022	561Q968453453	\$1768.91
CK 75023	601Q968453453	\$8433.32
CK 75024	615Q888437437	\$24376.83
CK 75025	704Q888437437	\$5549.63
CK 75026	704Q968453453	\$10613.57
CK 75027	706Q888437437	\$3849.23
CK 75028	706Q968453453	\$4202.46
CK 75029	770Q888437437	\$40.63
CK 75030	803Q888437437	\$10183.90
CK 75031	803Q968453453	\$12968.27
CK 75032	904Q888437437	\$7739.15
CK 75033	904Q968453453	\$3705.88
	TOTAL	\$201737.47

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CK 74772	205Q888437437	\$10584.76
CK 74773	228Q888437437	\$2286.26
CK 74774	305Q888437437	\$122.40
CK 74775	305Q968453453	\$732.69
CK 74776	318Q968453453	\$6070.31
CK 74777	502Q888437437	\$10138.55
CK 74778	502Q968453453	\$6030.75
CK 74779	561Q968453453	\$2936.63
CK 74780	601Q968453453	\$1882.03
CK 74781	615Q888437437	\$25173.84
CK 74782	704Q968453453	\$11922.74
CK 74783	706Q888437437	\$1877.20
CK74784	706Q968453453	\$4934.66
CK 74785	803Q888437437	\$15407.82
	TOTAL	\$100100.64