

STOLL·KEENON·OGDEN

PLLC

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August 27, 2008

RECEIVED

AUG 2 9 2008

Stephanie L. Stumbo Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

PUBLIC SERVICE

RE: <u>Petition of dPi Teleconnect LLC for Designation as an Eligible</u> <u>Telecommunications Carrier in the Commonwealth of Kentucky</u> Case No. 2008-00234

Dear Ms. Stumbo:

Enclosed please find and accept for filing the original and five copies of dPi Teleconnect LLC's Response to Commission Staff's Data Request Dated August 13, 2008 in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions please contact me at your convenience.

Douglas F. Brent

Yours very truly

DFB:

cc: Parties of Record

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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		PUBLIC SERVIC
PETITION OF DPI TELECONNECT LLC)	COMMUNICATION
FOR DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER IN)	CASE NO. 2008-00234
THE COMMONWEALTH OF KENTUCKY)	

RESPONSE OF DPI TELECONNECT LLC TO COMMISSION STAFF'S DATA REQUEST DATED AUGUST 13, 2008

Filed: August 27, 2008

In the Matter of:

DPI TELECONNECT LLC

CASE NO. 2008-00234

Response to Commission Staff's Data Request Dated August 13, 2008

Question No. 1

- Q-1. On pages 1 and 10 of the petition, dPi states that it is only seeking support for the provision of Lifeline and Link-Up services and is not requesting high-cost support. However, on page 8 of the petition, dPi states, "Granting ETC status to dPi would allow the Applicant to obtain federal universal support, which it will use to offer innovative telecommunications services at competitive prices to non-rural consumers in the Designated Service Area." Explain, in detail, the reason that dPi is not seeking high-cost support or, in the alternative, affirm that dPi is seeking high-cost support and the amount of support which it estimates it will receive.
- A-1: dPi is only seeking support for the provision of Lifeline and Link-Up services and is not requesting high-cost support. dPi's target market is Lifeline and Linkup Customers. Since dPi will offer all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs, or the equivalents thereof, dPi does not need nor is it seeking high-cost support.

Respectfully submitted,

Douglas F. Brent

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Counsel for dPi Teleconnect LLC

CERTIFICATION

STATE OF Texas)
)
COUNTY OF Dallas)

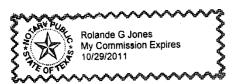
The undersigned, Brian A. Bolinger, deposes and says that he is the Vice President, Legal Affairs and that he has supervised the preparation of the responses on behalf of dPi Teleconnect, LLC, and that the responses are true and accurate to the best of his knowledge, information, and belief formed after a reasonable inquiry.

Brian A. Bolinger

Vice President, Legal Affairs

dPi Teleconnect, LLC

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 26th day of August, 2008.



Rolande G. Jones (SEAL)
Notary Public

My Commission Expires:

10-29-2011