

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 FIRST 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 May 1, 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. 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?

2. Provide any resale or commercial agreements you currently have in Kentucky with other telecommunications carriers. Include signed evidence of the agreements along with invoices detailing both Unbundled Network Elements ("UNE") and resale charges.

3. Describe the process in which Capital Communications orders a Section 251 loop and commingles it with Section 271 elements to provide service. Provide copies of orders or contracts that show the process.

4. How many Kentucky residential and business customers does Capital Communications presently serve? Provide both the number of residential and business customers and whether they are provided service through UNE pursuant to Section 251

commingled with Section 271 Elements, Resale, or wholesale local platform pursuant to a commercial agreement.

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

6. Explain the process Capital Communications will employ to audit each Lifeline customer on an annual basis.

7. Explain the process by which Capital Communications will verify the initial eligibility of Lifeline customers. Provide details about how and where Lifeline subscribers will be able to initiate service.

8. Does Capital Communications understand that Kentucky does not allow consumers to qualify for Lifeline under the income guidelines?

9. Does Capital Communications presently serve any Lifeline customers through resale in Kentucky?

10. Does Capital Communications understand that any resold Lifeline or Link-Up service purchased through another carrier cannot be claimed by Capital Communications for reimbursement from Universal Service Administrative Company ("USAC")?

11. Provide a list of all states in which Capital Communications operates.

12. Provide the docket numbers of Capital Communications' petitions for ETC in Alabama, Georgia, and any other state filed since the filing in Kentucky.

13. From the date of the filing of its petition in Kentucky, has Capital Communications filed a petition to provide service in any other state and subsequently withdrawn the petition or been denied? If so, list the state, docket number, and Capital Communications' reason for seeking withdrawal of the petition for that state.

14. If Capital Communications receives ETC designation in Kentucky, approximately how long will it take for Capital Communications to offer Lifeline service in the area in which it receives the ETC designation? Elaborate on any extenuating or special circumstances.

15. Do Capital Communications' customers have access to competitive directory assistance providers as defined by 47 C.F.R. 54.101(a)(8)? If not, explain why.

16. As a condition of receiving local service, are Capital Communications residential customers required to subscribe to Capital Communications long-distance services?

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

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

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

20. Will Capital Communications provide the \$13.50 Lifeline discount to any bundle a customer chooses?

21. Does Capital Communications provide service to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?

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) upon which universal service compensation would be based.

23. Describe the process which Capital Communications will employ if a customer does not pay his or her monthly fee.

a. Is there a grace period for making payment?

b. Would the customer have to re-enroll in Lifeline if they do not make payment for a month?

c. Are customers who reconnect service with the company required to pay the past-due bill and a reconnection fee prior to receiving service?

d. Are Lifeline customers allowed to pay past-due amounts over time? If so, describe the terms of such payments.

e. Are Lifeline customers charged a reconnection fee?

24. Does Capital Communications use agents or other retailers to market and sell its service? If so, provide a list.

25. Will Capital Communications be using any subcontractors (operations, call centers, etc.) to provide the required services? If so, provide the name of each company and the physical address.

26. Will Capital Communications be willing to advertise Lifeline and Link-Up availability in languages other than English? If so, name the other languages.

27. Has Capital Communications 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.

28. Does Capital Communications have any outstanding complaints at any state commission 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.

29. Will Capital Communications seek toll limitation service reimbursement from 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.

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

31. If granted ETC status, what is the amount per customer Capital Communications will seek for Lifeline reimbursement from USAC?

32. What is the amount per customer Capital Communications will seek for Lifeline reimbursement from the Kentucky Universal Service Fund if granted ETC status?

33. Does Capital Communications 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 telephone number, and name and title of the employee responsible for maintaining those books/general ledgers.

34. Provide the address (URL) to the Capital Communications website, if there is one.

35. Provide the name of the person (with business title) and/or entity that will be filing the Form 497 with USAC if Capital Communications obtains ETC status.

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.

37. Have any owners, officers, or managers of Capital Communications 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.

38. Have any owners, officers, or managers of Capital Communications 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, the case number, and the name of the state or federal court district where the charges or convictions occurred.



Jeff Derouen
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DATED APR 05 2011

cc: Parties of Record

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