Steven L. Beshear Governor

Leonard K. Peters Secretary Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission

211 Sower Blvd. P.O. Box 615 Frankfort, Kentucky 40602-0615 Telephone: (502) 564-3940 Fax: (502) 564-3460 psc.ky.gov

August 13, 2008

David L. Armstrong Chairman

James Gardner Vice-Chairman

John W. Clay Commissioner

Honorable Douglas F. Brent Attorney at Law Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson Street Louisville, KY 40202-2828

RE: Case No. 2008-00234

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact my staff at (502) 564-3940.

Sincerely,

Stephanie Stumbo Executive Director

SS/tw Enclosure



Steven L. Beshear Governor

Suite 900

Leonard K. PetersSecretary
Energy and Environment Cabinet

dPi-Teleconnect, LLC c/o TCS 3100 Cumberland Blvd SE

Atlanta, GA 30339-5930



Commonwealth of Kentucky Public Service Commission

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

ln	the	Mat	tter	of

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

COMMISSION STAFF'S DATA REQUEST TO DPI TELECONNECT LLC

dPi Teleconnect, LLC. ("dPi"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 5 copies of the following information, with a copy to each party of record. The information requested herein is due on or before September 10, 2008. 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 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.

dPi shall make timely amendment to any prior responses if the company obtains information which indicates that the responses were incorrect when made or, though correct when made, are now incorrect in any material respect. For any requests to which dPi fails to furnish all or part of the requested information, dPi shall provide a

written explanation of the specific grounds for the failure to completely and precisely

respond.

Careful attention should be given to copied material to ensure that it is legible.

When 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. 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.

Stephanie Stumbo

Executive Director

Public Service Commission

Frankfort, Kentucky 40602

DATED: August 13, 2008