

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF DPI-TELECONNECT, LLC)
FOR SUPPLEMENTAL ELIGIBLE) CASE NO. 2010-00048
TELECOMMUNICATIONS CARRIER)
DESIGNATION)

FIRST DATA REQUEST OF COMMISSION STAFF
TO DPI TELECONNECT, LLC

dPi Teleconnect, LLC ("dPi"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due on or before June 30, 2010. 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.

dPi 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 dPi fails or

refuses to furnish all or part of the requested information, dPi 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. 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. Affirm or deny that dPi is seeking to become an Eligible Telecommunications Carrier ("ETC") only for the purpose of receiving Lifeline and Link-Up Support.

2. Affirm or deny that dPi will provide wireless service only by way of reselling another carrier's service.

3. Affirm or deny that dPi does not own any facilities that enable it to provide wireless service.

4. Name the companies with which dPi has agreements that enable dPi to provide wireless service.

5. For each company above, provide a map for the service territory of that carrier.

6. Is dPi currently providing wireless service in Kentucky or any other jurisdiction?

7. If dPi is currently providing wireless service in any jurisdiction, please describe the manner in which dPi provides service to the customers, either by contract or on a prepaid basis.

8. List all states in which dPi has received ETC status and indicate if it is for wireline or wireless service. Also list all pending ETC petitions, with docket numbers and the state in which the designation is requested.

9. Has dPi filed for ETC status in any state and subsequently withdrawn the petition or been denied ETC status? If so, list the state and docket number.

10. Has dPi applied to the Federal Communications Commission ("FCC") for designation of ETC status as a wireless carrier?

11. Has dPi ever had its authority to operate in any state revoked?

12. Does dPi have any outstanding complaints at any state commissions or at the FCC? Provide detailed documentation of any complaint filed with a state commission or at the FCC in the past three years.

13. Provide a description of how dPi will use its own facilities in the provision of wireless service.

14. How did the company arrive at the figure of allowing customers 68 minutes of use per month?

15. Will wireless Lifeline customers be charged any fees?

16. How many minutes of use are included on the \$20, \$30, and \$60 airtime cards?

17. Are these airtime cards available only to Lifeline subscribers?

18. What is the total number of wireline and wireless customers served in Kentucky? Identify the manner in which service is provided to these customers. Provide the number of customers served by dPi-owned facilities, unbundled network elements, or resale.

19. What is the total number of wireline customers served in Kentucky that are Lifeline customers?

20. Provide examples of advertising that dPi currently uses that is directed to Lifeline customers.

21. Provide examples of advertising that dPi proposes to use that is directed to Lifeline customers of its wireless service

22. Affirm or deny that dPi customarily charges wireless customers a \$60 fee to initiate service. If there is a fee, will this fee be charged to Lifeline wireless customers?

23. The application states that, in 2005, the total low-income support portion of the federal Universal Service Fund ("USF") accounted for 12.4 percent of the total fund. Provide an updated statistic for each of the years since 2005.

24. Kentucky currently requires that all ETCs perform an audit of all customers receiving Lifeline benefits. Each customer must provide proof of eligibility. Does dPi agree to audit all Lifeline customers each year rather than conduct a yearly audit of only a statistically valid sample of customers as required by the FCC?

25. How does dPi propose to certify with all public Safety Answering Points in Kentucky that it is capable of providing 911 services?

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

27. How will dPi monitor the accounts of Lifeline customers to ensure that the customers are receiving the benefit of the service? For example, if a customer stops

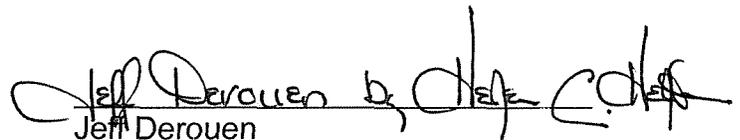
using his or her Lifeline wireless service after six months or if the wireless device is damaged so that it cannot be used, will dPi continue to credit the customer with minutes to the account?

28. Does dPi propose to contribute to or withdraw from the state USF which supports Lifeline?

29. Does dPi propose to contribute to the TRS/TAP fund?

30. Does dPi propose to pay the Commission's assessment on intrastate gross operating revenue for wireless revenue received?

31. Does dPi propose to collect the wireless 911 surcharge?



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: JUN - 2 2010

cc: Parties of Record

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

Stanley Q Smith
Watkins Ludlam Winter & Stennis, PA
190 East Capitol Street
Suite 800
Jackson, MS 39205-0427