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August 31, 2011

RECEIVED

SEP 02 2011

PUBLIC SERVICE  
COMMISSION

Jim Stevens  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, KY 40602-0615

Re: ETC Annual Certification of Lifeline Subscribers; dPi Teleconnect, LLC

Mr. Stevens:

Per the state rules, each ETC in the state of Kentucky must recertify each lifeline subscriber and verify that they are still currently meet the requirements of lifeline eligibility by participating in one of the eligible government programs or by income requirements set by the state.

This letter is to illustrate that dPi Teleconnect, LLC ("dPi") is in compliance with those rules but explain the issues they have encountered in the process leading to an incomplete recertification of each lifeline subscriber to date as required by the state to be complete by August 15<sup>th</sup> of each year.

To facilitate the annual re-certification/ verification dPi attempted to execute a business agreement with the Kentucky Cabinet of Family and Child Services to electronically verify each end user's participation in one of the lifeline programs they oversee. However, through multiple attempts, the agreement has yet to be executed.

Therefore, dPi must manually collect recertification/verification forms from each of our 435 lifeline customers in the state of Kentucky which cannot be completed by the required date. To complete the process, on August 1, 2011 dPi sent each end user the forms to be filled out and a request for proof of participation to verify their eligibility. Each month, until complete, dPi will send a status report to the commission showing the progress made to be in compliance with the state's annual requirements.

Please contact the undersigned should you have any questions or concerns at (214) 453-0640.

Respectfully Submitted,

A handwritten signature in cursive script that reads 'M. King'.

Melanie S. King  
Regulatory Manager