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STATE OF FLORIDA



DIVISION OF REGULATORY ANALYSIS
BETH W. SALAK
DIRECTOR
(850) 413-6600

Public Service Commission

March 1, 2010

Mr. Lance J.M. Steinhart, P.C.
Attorney for Bellerud Communications, LLC
1720 Windward Concourse, Suit 115
Alpharetta, Georgia 30005

Re: Docket No. 090457-TX - Application for designation as an Eligible Telecommunications Carrier (ETC) by Bellerud Communications, LLC

Dear Mr. Steinhart:

Staff is seeking additional information regarding Bellerud's application for ETC designation. Please provide a written response to each of the questions in the enclosed data request on or before March 15, 2010.

Your company may avail itself of the statutory confidential provisions of Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, if it believes it is necessary to comply with this data request.

If you have questions, please contact Curtis Williams at (850) 413-6924 or Bob Casey at (850) 413-6974. Thank You.

Sincerely,

A handwritten signature in black ink that reads "Beth Salak".

Beth Salak
Director

BWS/cjw
Enclosure

cc: Division of Regulatory Analysis (Williams, Casey)
Office of General Counsel (Murphy, Teitzman)
Docket No. 090457-TX

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38. In response to data request No. 1, Bellerud failed to indicate whether the services in each state are provided through a wholesale local platform or through resale. Please respond by indicating how many services in each state are provided through a wholesale local platform or through resale.
39. In response to data request No. 2, Bellerud failed to provide the docket number in Alabama which designated it as an ETC. Please provide the docket number.
40. In response to data request No. 3, Bellerud provided a 2 page copy of an Embarq resale agreement as proof it will be using a combination its own facilities and resale of another carrier's facilities. However, in response to data request No. 11, Bellerud indicated that it is only requesting ETC designation in AT&T's territory. Does Bellerud have an interconnection agreement with AT&T showing it has the ability to purchase UNEs to meet the facilities requirement? If so, please provide.
41. In response to data request No. 5, Bellerud failed to indicate the number of residential lines served by UNEs and the number of residential lines served through resale. Please provide this information.
42. In response to data request No. 21, Bellerud refers to Exhibit C to show the ownership of Bellerud. Please provide a list of each owner, corporate officer and managing member of Associated Telecommunications Management Services, LLC and Bellerud Acquisition Group, LLC, and explain each person's responsibilities. Indicate if any are also owners, corporate officers, or managing members of any other Telecommunications Companies. If so, list the companies.
43. In response to data request No. 23, Bellerud lists a TLS administrative fee of \$0.50 per customer. Please explain what that charge is for and how the amount was calculated.
44. In response to data request No. 24, Bellerud states it will claim a \$30.00 Link-up reimbursement or the highest amount allowable. What is the initial connection charge Bellerud charges for Lifeline customers?
45. How is long distance service provisioned to Bellerud customers? Please provide the name of the provider.
46. In response to data request No. 29, Bellerud states that if a company provisions via resale and puts the asg USOC codes on the resale order, then AT&T can identify a Lifeline customer and market directly to them. Are you aware of any instances when this occurred? If so, please describe. Since Bellerud is requesting ETC status to prevent this marketing, are all Lifeline customer lines going to be provisioned using UNEs?
47. Please confirm the Bellerud response to data request No. 30. Are all existing customers served through 100% resale lines?

48. Have any Associated Telecommunications Management Services, LLC or Bellerud Acquisition Group LLC owners, officers, or managing members been involved in any bankruptcy proceedings? If so, please provide details as to who, when, and where the bankruptcy occurred.
49. Have any Associated Telecommunications Management Services, LLC or Bellerud Acquisition Group LLC owners, officers, or managing members been charged or convicted of a criminal offense? If so, please provide details as to who, when, and where the charges or convictions occurred.
50. Have any Associated Telecommunications Management Services, LLC or Bellerud Acquisition Group LLC owners, officers, or managing members been involved in any civil litigation in which a Associated Telecommunications Management Services, LLC or Bellerud Acquisition Group LLC owner, officer, or managing member has been deposed or has been a plaintiff, a defendant, or a witness? If so, please provide details as to who, when, and where the civil litigation occurred.
51. Has Bellerud applied for a Service Provider Identification Number (SPIN) from the Universal Service Administrative Company? If so, please provide the SPIN number.
52. Please provide the corporate structure for Associated Telecommunications Management Services, LLC listing all owned and affiliated companies.
53. Provide the latest financial statements for Associated Telecommunications Management Services, LLC and Bellerud Acquisition Group, LLC, including: Profit & Loss Statements, Balance Sheets, and the most recent Federal Tax Returns.
54. Please provide the business plan for Associated Telecommunications Management Services, LLC and how each owned or affiliated company fits into its plan.
55. Please provide copies of any agreements consummated between Associated Telecommunications Management Services LLC, Bellerud Acquisition Group LLC, and Bellerud Communications, LLC.
56. Please provide a list of any companies which will be contracted with to provide services to Lifeline customers. List each company and what service it will provide.
57. Will Associated Telecommunications Management Services, LLC be moving Lifeline customers between its owned or affiliated companies? If so, please explain.
58. Bellerud's Lifeline application includes a box for eligible Lifeline programs which includes "*Senior Citizen Low-Income Discount Plan.*" This is not a Lifeline approved eligibility program in Florida. Why is it on the Lifeline application?

59. Bellerud's Lifeline application states "I understand that completion of the application does not constitute immediate enrollment in the Lifeline or Link-Up programs." Why not?
60. Bellerud's Lifeline application states "*I authorize my local telephone company to take all actions possible to keep my service active including providing my personal confidential information to third party companies and/or carriers who may be able to assist in locating alternate telephone service.*" It would appear that Bellerud is asking for this authorization to be able to switch carriers for the Lifeline customer at will. Please explain the reasoning for inclusion of this language. Is Bellerud's plan to be able to switch the Lifeline customer between other Associated Telecommunications Management Services, LLC companies?
61. Bellerud's Lifeline application does not have the name of the company or any contact information on it. Please explain why that information is not on the Lifeline application.
62. Please provide the physical location of all books and records of Associated Telecommunications Management Services, LLC, Bellerud Acquisition Group LLC, and Bellerud Communications, LLC, and provide the days and times when these books and records are available for examination.