

State of Florida



# Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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COMMISSION  
CLERK

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**DATE:** August 30, 2010  
**TO:** Ann Cole, Commission Clerk, Office of Commission Clerk  
**FROM:** Curtis J. Williams, Regulatory Analyst IV, Division of Regulatory Analysis  
**RE:** Docket No. 100124-TX – Document to be Included in the Docket file

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*Handwritten initials and signature:*  
CJW  
AC  
[Signature]

Please file the attached document in the docket file for Docket No. 100124-TX. This document consist of data request responses from Sun-Tel USA which were included as an attachment to an e-mail. If you have any questions, please let me know. Thank You.

CJW  
Attachment

DOCUMENT NUMBER DATE  
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FPSC-COMMISSION CLERK

**General Data Requests for Docket No. 100124-TX**

1. Does Sun-Tel provide Lifeline service in any other state? If so, please list the state and whether this service is provided through a wholesale local platform or through resale. In addition, have any of these state utility commissions received any complaints concerning Sun-Tel service in that state? If so, please describe.

Sun-Tel USA does provide service in the state of Kentucky via resale of AT&T services. (Sun-Tel USA also provides service on the same basis here in Florida.) There are no outstanding complaints against Sun-Tel USA in Kentucky or Florida.

2. Has Sun-Tel been granted or denied ETC status in any other state? If so, please list the state and docket number in which ETC status was granted or denied. Has Sun-Tel filed for ETC status in any state and subsequently withdrawn the petition? If so, please list the state and docket number.

Sun-Tel USA has not been granted or denied ETC status in any other states, nor has Sun-Tel USA filed for ETC status with any other states and withdrawn the petition.

3. According to 47 C.F.R. 54.201(d)(1), a company must offer the services that are supported by federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services. Please provide any resale or commercial agreements you currently have in Florida with other telecommunications carriers or signed evidence of the agreements.

Sun-Tel USA has both Resale and Commercial agreements with AT&T. Sun-Tel USA will provide service pursuant to a "UNE-P" type interconnection arrangement in Florida, once ETC status is granted.

4. What facilities, planned or existing, does Sun-Tel have in Florida in order to serve Florida customers?

Sun-Tel USA uses resold AT&T facilities to service customers in Florida currently—and will utilize UNE-P type facilities from AT&T to provide service pursuant to our commercial agreement once ETC status is granted.

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5. How many Florida residential and commercial customers does Sun-Tel presently serve? Please provide both the number of residential and business customers and the number served through UNEs and the number served through resale.

Residential Customers currently served through resale: 486  
Business Customers currently served through commercial UNE-P type services: 64

6. Please provide examples of how Sun-Tel advertises or will advertise, using media of general distribution, the availability of the supported services and what the charges are for these services.

Sun-Tel USA will advertise in newspapers, radio, tv and direct mail other normal generally distributed advertisements specified by the Commission and USAC in addition to provision of information about Lifeline availability via community partnerships with social service groups that also interface with Lifeline eligible consumers. The supported services will be available on a universal basis in the exchanges listed as an attachment to our ETC application. The charges for Lifeline service from Sun-Tel USA to residential consumers will be as follows:

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The charge for service with Caller ID, Call Waiting, and Internet Service is \$39.99 less the lifeline discount of \$13.50 totaling \$26.50

The charge for basic local calling service is \$29.99 less the lifeline discount of \$13.50 totaling \$16.50.

7. Does Sun-Tel provide service to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?

All customers currently receive services via prepaid billing.

8. What is the average customer bill for a Sun-Tel residential telephone customer? In your response, please include the jurisdictions that this information is obtained from, and if there are variances in the bills pertaining to Florida customers, delineate those differences.

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Our average customers take the Basic +2 package that includes Caller ID and Call Waiting and the "after Lifeline credits" price for this package is \$26.50 plus applicable taxes and fees. See response to question 11 for the three available tiers of service.

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9. As a condition of receiving local service, are Sun-Tel residential customers required to subscribe to Sun-Tel long-distance services?

Customers are not required to subscribe to Sun-Tel USA's long-distances services.

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10. If Sun-Tel receives an ETC designation in Florida, approximately how long will it take for Sun-Tel to offer Lifeline service in the area in which it receives the ETC designation? Please elaborate on any extended or special circumstances.

Sun-Tel USA currently offers Lifeline services and will continue to do so once ETC designation is granted. Lifeline service is now provided via resale but will be provided directly once ETC status is granted.

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11. Describe Sun-Tel's local usage plans pursuant to 47 C.F.R. 54.101(a)(2). If phone service is offered in a bundled package, please describe and enumerate the wireline local component (charge for local phone service) for which universal service compensation would be based on?

Local services are billed at \$29.99, \$39.99, and \$49.99 before lifeline credits of \$13.50 are given to eligible consumers. The local service component of each package is priced at \$29.99 which is \$16.50 after the lifeline discount of \$13.50 is applied.

12. Describe the access Sun-Tel plans to provide to emergency services, such as 911 and enhanced 911 as defined in 47 C.F.R. 54.101(a)(5).

Sun-Tel USA will provide direct dial access to 911 and E-911 services as required by 47 C.F.R. 54.101(a)(5).

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13. Do Sun-Tel's customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. 54.101(a)(8).

Yes. Sun-Tel USA will provide access to competitive directory assistance providers as required by 47 C.F.R. 54.101(a)(8)

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14. Describe the toll-limitation features of Sun-Tel. See 47 C.F.R. 54.101(a)(9).

Toll Blocks are placed on accounts to remove the need for deposits or credit checks. These toll-limitations block 3<sup>rd</sup> party billing, international calling, and incoming collect calls.

15. According to 47 C.F.R. 54.101(c):

A state commission may grant the Application of a telecommunications carrier that is otherwise eligible to receive universal service support under Sec. 54.201, if the party is requesting additional time to complete the network upgrades needed to provide single-party service, access to enhanced 911 service, or toll limitation. If such Application is granted, the otherwise eligible communications carrier will be permitted to receive universal service support for the duration of the period designated by the state commission.

If you will be making such a request, what time frame will be necessary for Sun-Tel to accomplish these network upgrades? Please include in your response all areas for which you are seeking ETC designation.

Sun-Tel USA does not require or intend to request additional time to implement these services.

16. Does Sun-Tel have any outstanding complaints at the Federal Communications Commission? If yes, please provide a synopsis of these complaints.

There are no outstanding FCC complaints that Sun-Tel USA is aware of.

17. Please provide a Certification attesting to the best of your knowledge, information and belief, all statements of fact contained in the request are correct statements of the business and affairs of the requesting carrier with respect to each and every matter set forth in this request.

This has been included with the ETC Certification Application.

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18. Does Sun-Tel understand that any resold Lifeline, Link-Up, or TLS service purchased through another carrier cannot be claimed by Sun-Tel as access lines eligible for reimbursement from USAC?

Yes Sun-Tel USA understands this and will only request reimbursement from USAC for eligible non-resold lines.

19. Please provide Sun-Tel's corporate structure.

Corporate structure is as follows:

Sun-Tel is a privately held Florida for-profit corporation.

Deleted: CEO - Fatullah J Babadi  
President - Jahan J Babadi

20. Please provide a list of Sun-Tel's owners or corporate officers and indicate if any are also owners, corporate officers, or employees of any other Telecommunications Companies.

Sun-Tel USA's owners and corporate officers are Fatullah J Babadi (CEO) and Jahan J Babadi (President). They each own 50% of Sun-Tel USA and are not owners or part of any other Telecommunications Companies.

21. Will Sun-Tel seek TLS reimbursement from USAC if granted ETC status? If yes, provide a detailed list of the incremental costs it will be claiming.

Yes, Sun-Tel will request to cover the cost of the toll block that ATT charges for monthly for crex toll blocks.

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22. Will Sun-Tel seek Link-Up reimbursement from USAC if granted ETC status? If yes, list the amount per customer Sun-Tel would be claiming.

Yes, Sun-Tel USA will be seeking Link-Up reimbursement in the amount of \$30.00.

23. Will Sun-Tel seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer Sun-Tel would be claiming.

Yes, Sun-Tel USA will be seeking Lifeline reimbursement from USAC in the amount of \$10.00 per customer/month.

24. Does Sun-Tel provide service to customers using bundled packages? If so, will Sun-Tel provide the \$13.50 Lifeline discount to any bundle a customer chooses?

Yes, Sun-Tel USA will continue to offer bundled package options to customers. Sun-Tel USA will always provide the full \$13.50 Lifeline discount to Lifeline customers.

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regardless of service package purchased.

25. Does Sun-Tel understand that Florida ETCs provide a non-reimbursable \$3.50 credit per month to each Lifeline customer's bill in addition to the Federal \$10.00 reimbursement credit?

Yes, Sun-Tel USA understands and will abide by this requirement.

26. Does Sun-Tel understand that Florida's Lifeline program provides that if a Lifeline customer is no longer eligible for Lifeline, the ETC must provide a 30% monthly discount off its local rate to that customer for a period of 12 months at the ETCs expense?

Yes, Sun-Tel USA understands and will abide by this requirement.

27. Please provide Sun-Tel's purpose for requesting ETC status in Florida. 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?

Sun-Tel USA believes it can operate on a more efficient, effective and viable long term basis by becoming an ETC itself rather than continuing to provide service on a resale basis. Sun-Tel USA has experienced a variety of operational challenges as an AT&T reseller that it believes will be eliminated once Sun-Tel becomes an ETC itself. Sun-Tel USA has also found that it is not able to compete effectively through offering the lowest prices to consumers in comparison to the rates offered by ETC carriers that are not resellers.

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28. How many residential and business customers does Sun-Tel have in Florida?  
Please see response to Question 5 above.

29. Is Sun-Tel currently providing Lifeline service in Florida to consumers using resold access lines from its underlying carrier? If so, how many Lifeline customers are being served?

Yes. Sun-Tel USA is currently providing Lifeline service in Florida to consumers using resold AT&T lines and services. Currently, Sun-Tel USA serves 486 Residential Lifeline customers

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30. Will Sun-Tel be using any type of VoIP service to provide service to Lifeline customers?

Sun-Tel USA does not plan to use VoIP services to provide Lifeline service to customers in Florida.

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31. Does Sun-Tel provide wireless services to customers? If so, does Sun-Tel plan on offering wireless services to Lifeline customers?

Sun-Tel USA does offer wireless (non-Lifeline) services on an "agent" basis at present.

Sun-Tel USA plans to explore the offering of wireless services to Lifeline customers in the future, once ETC certification is obtained, but understands that a separate and subsequent ETC application would be required prior to offering such wireless Lifeline services.

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32. Please provide Sun-Tel's most current financial statements including Balance Sheet and Profit and Loss Statements. Please indicate who prepared the statements.

Please see attachment

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33. Please provide copies of all Federal and State of Florida income tax and/or corporate filings made on behalf of Sun-Tel for the last three years.

Please see attachment

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34. Has Sun-Tel or any owners, officers, or managers of Sun-Tel been involved in any bankruptcy proceedings? If so, please provide details as to who, when, and where the bankruptcy occurred.

Sun-Tel USA has never filed for bankruptcy during its 10 years of existence. Fatullah I. Babadi filed for personal bankruptcy in 1997 in Jacksonville, Florida.

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35. Have any owners, officers, or managers of Sun-Tel been charged or convicted of a criminal offense? If so, please provide details as to who, when, and where the charges or convictions occurred.

No.

36. Please identify all civil litigation in which a Sun-Tel owner, officer, or manager has been deposed or has been a plaintiff, a defendant, or a witness.

None

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37. Please provide the physical location of Sun-Tel's books and records, along with the days and times these books and records are available for examination.

5921 University Blvd W. Suite 2 Jacksonville, FL 32216. Records are available for inspection during normal business hours: M-F 9am to 7pm Eastern.

38. Please provide a list of any companies which Sun-Tel will be contracting with to provide services to Lifeline customers. List each company and what service(s) it provides.

AT&T will provide all underlying services on a UNE-P type basis pursuant to commercial agreement with Sun-Tel USA.

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