

2013 Competitive Local Exchange Carrier (CLEC) Questionnaire
(Due by April 15, 2013)¹

Legal Company Name: RightLink USA, Inc.

D/B/A: _____

FPSC Company Code (e.g., TX000) TY075

Contact name & title: Min-Su Kang, President

Telephone number: 901-415-1733

E-mail address: mtkang@rightlinkUSA.com

Stock Symbol (if company is publicly traded): _____

Services Provided in Florida

1. Do you currently serve local telephone subscribers in Florida? Please check yes or no for both wireline and VoIP.

Residential Business
Wireline VoIP Wireline VoIP
Yes No Yes No Yes No Yes No

2. Please complete all applicable data tables.

3. If you submitted data tables in 2012, please provide an explanation below of any differences in the number of access lines by category that occurs in your 2013 submission that exceeds 10 percent.

4. How is your local service provisioned? Please mark the appropriate response(s).

- Resold lines from ILEC
Wholesale platform (formerly known as UNE-P)
UNEs (other than wholesale platform) from ILEC
Elements (e.g., loops, switching) from other than ILEC (e.g., other CLECs)
Completely self-provisioned
Other (please describe)

¹ The due date is established by Section 364.386(1)(b), Florida Statutes. Failure to comply with this rule may result in the Commission assessing penalties of up to \$25,000 per offense, with each day of noncompliance constituting a separate offense per Section 364.285(1), Florida Statutes.

5. What services, other than local service, does your company currently provide in Florida? Please check all that apply.

Private line/special access
 VoIP
 Wholesale transport
 Interexchange service
 Cellular/wireless service

Wholesale loops
 Fiber or copper based video service
 Cable television
 Satellite television
 Broadband Internet access

Bundled Services

6. What percentage of your Florida residential and business customers purchase bundled (i.e. voice service packaged with additional services such as internet or video service) offerings? Please provide the percentage below. Do not include bundles of telecom-only services. If you do not offer bundled services, indicate "not applicable."

Residential
 Business
 Not applicable

VoIP

7. Indicate below whether you are currently providing VoIP service to end users in Florida. VoIP service is defined as IP-based voice service over a digital connection. Please check all that apply.

Not providing VoIP service to end users
 Providing VoIP services to business end users
 Providing VoIP services to residential end users

8. If you are providing VoIP service in Florida, please check all that apply:

Peer-to-Peer only (no interconnection with PSTN)
 Use of public Internet
 Use of private IP network

Broadband

9. Do you offer broadband to residential customers in Florida?

Yes
 No

10. If you do offer broadband to residential customers in Florida, please provide your best estimate of the percentage of residential end user premises in your Florida service area for which your broadband services are available.

[REDACTED]

11. How many residential broadband subscribers do you have in Florida?

[REDACTED]

12. Please list the method(s) of broadband provisioning utilized in Florida by your company (i.e. DSL, cable modem, fiber, etc.).

[REDACTED]

13. What are the typical downstream and upstream speeds for your most subscribed to broadband service?

[REDACTED]

14. What is the monthly price for your most subscribed to residential broadband service?

[REDACTED]

Fiber Deployment

15. Did you deploy fiber to homes or businesses in Florida between January 1, 2012 and December 31, 2012?

[REDACTED] Yes
[REDACTED] No

16. Please provide the number of new residential and business subscribers served by Fiber-to-the-Home, Fiber-to-the-Premises, and/or Fiber-to-the-Curb technology since the last reporting period.

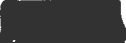




[REDACTED] Residential Subscribers
[REDACTED] Business Subscribers
[REDACTED] Total

17. Please provide your company's total number of residential and business subscribers currently served by Fiber-to-the-Home, Fiber-to-the-Premises, and/or Fiber-to-the-Curb technology.

[REDACTED] Residential Subscribers
[REDACTED] Business Subscribers
[REDACTED] Total

Miscellaneous

18. In calendar year 2012, how much money did you invest in your network directly serving Florida's local service customers? Please check the applicable answer.

1.  \$0
2.  \$1 - \$249,999
3.  \$250,000 - \$999,999
4.  \$1,000,000 - \$9,999,999
5.  \$10,000,000 or more

20. Are you currently operating under Chapter 7 or Chapter 11 bankruptcy protection? Please check yes or no.

-  Yes
 No

21. Please provide a copy of the Form 477 you filed with the FCC with data as of **December 31, 2012**.

Comments

22. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any major obstacles or barriers encountered that you believe may be impeding the growth of local competition in the state, along with any suggestions as to how to remove such obstacles. Any additional general comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida are welcome.

Form 477 Submission for FRN: [REDACTED], Company: Rightlink USA, Inc, State: FL, Operations: Non-ILEC, Data as of Dec 31, 2012

Status: On Feb 27, 2013, the status for this Form 477 submission was changed to Original - Submitted.

All filers must complete items 1 through 11 below

Data Description	Value
Data as of	Dec 31, 2012
1. FRN	[REDACTED]
2. Company	Rightlink USA, Inc
3. Type of Operations	ILEC <input type="radio"/> Non-ILEC <input checked="" type="radio"/>
4. Use this drop-down list to select a single name, such as the holding company, to identify all commonly-owned or commonly-controlled filers. Commonly-controlled filers with no holding company should decide on a single name to use for this question. Select "not shown" if no appropriate name appears in the list.	Rightlink USA, Inc.
If you selected "not shown" above, type in the single name that will identify all commonly-owned or commonly-controlled filers.	
5. State	FL
6. Contact person (person who prepared the submitted data)	Min-Su Kang
7. Contact person telephone number and email address	Phone. 901-415-1733 Email. mtkang@rightlinkusa.com Confirm Email. mtkang@rightlinkusa.com
8. Status of submission	Original - Submitted
9. Indicate whether you request non-disclosure of some or all of the information in this submission because you believe that this information is privileged and confidential and public disclosure of such information would likely cause substantial harm to the competitive position of the filer.	No <input checked="" type="radio"/> Yes
10. Official (corporate officer, managing partner, or sole proprietor) whose signature certifies that he/she has examined the information contained in this Form 477 and that, to the best of his/her knowledge, information and belief, all statements of fact contained in this Form 477 are true and correct. For purposes of this Form 477, the entry of the official's name on this line shall constitute that official's electronic signature to this certification. Persons making willful false statements in a Form 477 can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).	Min-Su Kang
11. Certifying official telephone number and email address	Phone. 901-415-1733 Email. mtkang@rightlinkusa.com

Part II.A: Local Exchange Telephone Service

(1)

(2)

(3)

(4)

Voice-grade equivalent lines and voice-grade equivalent wireless channels in service to your

Voice-grade equivalent lines you provided to unaffiliated communications carriers under resale arrangements including, among others, commercial agreements that replaced UNE-P and resold services such as local

Lines you provided to unaffiliated communications carriers under any UNE loop arrangement where you did not also provide UNE switching for the line. (Do not convert UNEs

Lines you provided to unaffiliated communications carriers as UNE-P. (Do not convert UNEs to

	end user customers	exchange, Centrex, and channelized special access	to voice-grade equivalents.)	voice-grade equivalents.
(a) Total number. See instructions on what to include.	[REDACTED]			
(b) Percentage of (a) that are residential lines	[REDACTED]			
(c) Percentage of (a) for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]			
(d) Percentage of (a) used for residential service AND for which you (including affiliates) are the presubscribed interstate long distance carrier	[REDACTED]			
(e) Percentage of (a) provided over your own (including affiliates) local loop facilities or the equivalent	[REDACTED]			
(f) Percentage of (a) provided over UNE loops obtained from an unaffiliated carrier without also obtaining that carrier's UNE switching for that line	[REDACTED]			
(g) Percentage of (a) provided over UNE-Platform (but treat commercial agreements that replaced UNE-P as "provided by reselling," below)	[REDACTED]			
(h) Percentage of (a) provided by reselling unaffiliated-carrier services including, among others, commercial agreements that replaced UNE-P and resold services such as local exchange, Centrex, and channelized special access	[REDACTED]			
(i) Percentage of (a) provided over optical fiber at the end user premises	[REDACTED]			
(j) Percentage of (a) provided over coaxial cable at the end user premises	[REDACTED]			
(k) Percentage of (a) provided over fixed wireless at the end user premises	[REDACTED]			

Part II.B: Interconnected VoIP Service

See instructions for definitions of terms used in this Part. If you report end user subscriptions in (1) - (2), you must also complete Part V of Form 477.

Reporting by State: Subscriptions reported in (1) must be reported in the state of the subscriber's "Registered Location" as of the data-collection date. (This is the most recent information obtained by an interconnected VoIP service provider that identifies the physical location of the end user. See 47 C.F.R. § 9.3.) Subscriptions reported in (2) must be reported in the same state as the broadband connection purchased in conjunction with the VoIP service.

	(1)	(2)	(3)
	VoIP subscriptions that end users purchased from you without also purchasing a broadband connection from you	VoIP subscriptions that end users purchased from you in conjunction with the purchase of a broadband connection	Wholesale customers who purchased your VoIP service to resell as their own VoIP service

(a) **Total number.** See instructions on what to include.

(b) **Percentage** of (a) provided

under residential grade service plans

(c) **Percentage** of (a) purchased under terms that allow use with any broadband connection ("nomadic" functionality)

(d) **Percentage** of (a) provided in conjunction with a copper wire-based broadband connection (DSL or Other Wireline)

(e) **Percentage** of (a) provided in conjunction with a fiber-to-the-end user broadband connection

(f) **Percentage** of (a) provided in conjunction with a Cable Modem broadband connection

(g) **Percentage** of (a) provided in conjunction with a fixed wireless broadband connection

(h) **Percentage** of (a) provided in conjunction with any other type of broadband connection

Part III: Mobile Local Telephone

In Part III, report cellular, PCS, and other mobile voice telephony subscribers in the state that you served over your own facilities. Include directly billed subscribers, pre-paid subscribers, and subscribers served via resellers. Count a subscriber as a mobile handset, car-phone, or other revenue-generating active voice unit that has a unique phone number and that can place and receive calls from the public switched telephone network. Subscriber counts by state should be based on the area codes of the phone numbers provided to subscribers.

(1)
Mobile voice telephony subscribers in service and served over your own facilities

(a) Total number

Percentage of (a) that are directly billed or pre-paid subscribers

Part V: Zip Code Information – Local Voice Telephone Service and Interconnected VoIP

If you reported local exchange telephone lines in service to your end user customers, in Part II.A (1), or VoIP subscriptions that end users purchased from you, in Part II.B (1) or (2), you must list the 5-digit ZIP Codes in the state in which you had end user customers. Do not include any ZIP Codes in which you offered your local exchange telephone or VoIP service but had no end user customers, and do not include any out-of-state ZIP Codes.

Type all five digit ZIP codes in the following text box, separated by either commas, spaces, or carriage returns:

[REDACTED]

Errors / Warnings

No Errors or Warnings found.