

June 17<sup>th</sup>, 2016VIA E-FILING

Director, Beth W. Salak  
Florida Public Service Commission  
OFFICE OF TELECOMMUNICATIONS  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

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2016 JUN 22 AM 10:36  
COMMISSION  
CLERK

**RE: Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Dear Director, Beth W. Salak,

Enclosed for filing is **Integrated Path Communications, LLC's** response to **3rd Data Request for Docket No. 160016-TX - Application for designation as eligible telecommunications carrier (ETC) by Integrated Path Communications LLC.**

Please acknowledge receipt of this filing by returning via email to [bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com) or via fax (518-325-1397) this cover letter file stamped received.

Questions regarding this filing may be directed to Brian Shepard at 518-325-1396 or email to [bshepard@ipc-llc.com](mailto:bshepard@ipc-llc.com).

Sincerely,



Brian Shepard  
President - Integrated Path Communications, LLC

### 3<sup>rd</sup> Data Request for Docket No. 160016-TX

60. For purposes of your responses to staff's questions in this docket, please define and differentiate the following terms: "Provide" and "Offer."

**Response:**

Provide would be defined as currently having a customer that is using the service that Integrated Path is selling. Offer is defined as making the service available to potential customers. Since the last set of questions, Integrated Path is now providing local telecommunications services within the state of Florida.

61. In response to staff's data request question number 49, Integrated Path states that it "... has just started marketing retail services within the State of Florida." Please indicate when Integrated Path started marketing its retail services in Florida by geographic market, the form(s) of marketing used, and provide examples of marketing material used in Florida.

**Response:**

Integrated Path is now providing local telecommunications services to customers within the state of Florida. Integrated Path is using direct sales to business customers through telemarketing.

62. Will Integrated Path file a revision to its March 10, 2016 Compliance Plan with the Federal Communications Commission (FCC) to clarify that at the time, Integrated Path did not have: 1) any residential customers in Florida, and 2) approval as an Eligible Telecommunications Carrier (ETC) in Florida? If no, explain why.

**Response:**

Integrated Path has anticipated having customers on its network prior to the filing of the compliance plan. Integrated Path is not planning on updating the compliance plan at this time as it currently has local customers in Florida.

63. In response to question number 46, Integrated Path stated that it was approved to provide low income only support in Wisconsin with authority to provide telecommunications on Tribal lands in Wisconsin. Is Integrated Path currently providing Lifeline service in Wisconsin? If yes, please specify the number of customers on 1) Non-Tribal and 2) on Tribal lands for the most recent month that data is available.

**3<sup>rd</sup> Data Request for Docket No. 160016-TX**

**Response:**

Integrated Path is not currently providing Lifeline service in the state of Wisconsin.

64. Does Integrated Path have any plans to revise its website to more prominently advertise the availability of Lifeline services?

**Response:**

Yes. Integrated Path is in the process of updating its website to include its Lifeline services products.

65. Will Integrated Path have an online application or a link to the Florida Lifeline application if it is granted ETC designation?

**Response:**

Yes. Integrated Path will have an online application or link to the Florida Lifeline application if it is granted ETC designation.

66. Does Integrated Path agree that Tribal Link Up is a onetime reimbursement and not an ongoing monthly reimbursement per household? If not, please explain.

**Response:**

Integrated Path is fully aware that the link up program is only available to facilities based carriers that provide service to Native American Reservations. Link up is a one-time reimbursement to qualifying customers.

67. Please see Integrated Path's response to staff's data request question 47. Integrated Path's response states: "Integrated Path has not received any High-Cost Support to date. The company has requested High-Cost Support in New York as well as Florida." Has Integrated Path requested High-Cost Support 1) only in New York and Florida, 2) in all states where an ETC designation is sought, or 3) in the following states (please specify)?

**3<sup>rd</sup> Data Request for Docket No. 160016-TX**

**Response:**

Integrated Path is approved to receive High Cost support in New York and Texas, but has not filed for any support with USAC at this time.

68. Please see Integrated Path's response to staff's data request question number 39 and 57. Please identify the specific federal High-Cost program(s) Integrated Path asserts that it would receive support from if ETC designation is granted in AT&T Florida's service territory during the current phase of the Connect America Fund Phase II support?

**Response:**

Integrated Path needs to be high cost certified in the State of Florida to be able to participate in any future Connect American Fund auctions initiated by the FCC.

69. Please see Integrated Path's response to staff's first data request question number 21. In this response, Integrated Path states it is seeking ETC designation for the Seminole tribe and identifies the three counties for which the Seminole tribe has reservations. In its application, Integrated Path is requesting ETC designation only for the rate centers identified in attachment A of its petition. For each reservation listed in the answer to question number 21, please identify the rate center and associated CLLI code that services the tribal reservations Integrated Path seeks to serve as an ETC. For each tribal area identified, please indicate if they also service areas outside of the federal recognized Tribal lands.

**Response:**

Wire Centers for the Seminole Tribal area

HOLLYWOOD - HLWDFLHD

TAMPACEN - TAMPFLXED

IMMOKALEE - IMKLFLXAR

OKEECHOBEE - OKCBFLXAD

### 3<sup>rd</sup> Data Request for Docket No. 160016-TX

70. Please review, 47 C.F.R. § 54.414. Does an ETC have to actually receive High-Cost support in a given area in order for it to receive Tribal Link Up support or can an ETC only be eligible to receive High-Cost support in an area in order to receive Tribal Link Up support, or other? Please explain.

**Response:**

To receive linkup support an Eligible Telecommunications Carrier cannot be a low income only ETC and must be approved to receive High Cost support.

71. Pursuant to 47 U.S. Code § 214(e)(6), state commissions must have independent state authority to designate a carrier as an ETC.<sup>1</sup> Please identify any State of Florida rule or law identifying regulatory jurisdiction of the PSC to designate a carrier as an ETC in federally recognized tribal lands.

**Response:**

Integrated Path believes that the FCC granted the state of Florida the ability to approve the service territory of Eligible Telecommunications Carrier. If the Florida Commission believes that it does not have the authority, then Integrated Path will request such certification from the FCC directly.

72. The Federal Communications Commission (FCC) has stated that “a carrier should consult with the relevant tribal authority and/or state commission on whether the state commission has jurisdiction to designate the carrier.”<sup>2</sup> Please provide the result of such discussion with the Seminole Tribe and the name and contact information for a tribal representative authorized to speak for the Tribe on this matter.

**Response:**

Integrated Path has made contact and had initial discussions with the tribe’s IT department regarding the Company’s service offerings.