

Ruth Nettles

From: Angela Janssen [ajanssen@telecomcounsel.com]
Sent: Thursday, October 16, 2008 12:05 PM
To: Filings@psc.state.fl.us
Cc: Lance Steinhart
Subject: Image Access, Inc. d/b/a NewPhone
Attachments: FL Data Request Response Filing.pdf

Attached please find Data Request Responses for Image Access, Inc. d/b/a NewPhone; Docket No. 080523-TX. The original filing will be sent via overnight delivery to the Commission.

Thank You -

Angela M. Janssen, Legal Assistant
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 115
Alpharetta, Georgia 30005
www.telecomcounsel.com
(678) 775-2253 (Direct Dial)
(678) 775-1193 (Direct Fax)
e-mail: ajanssen@telecomcounsel.com

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

10/16/2008

DOCUMENT NUMBER-DATE

09868 OCT 16 8

FPSC-COMMISSION CLERK

Lance J.M. Steinhart, P.C.
Attorney At Law
1720 Windward Concourse
Suite 115
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

October 16, 2008

**VIA ELECTRONIC FILING AND
OVERNIGHT DELIVERY**

Beth Salak, Director
Division of Competitive Markets & Enforcement
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gunter Bldg.
Tallahassee, Florida 32399-0850
(850) 413-6770

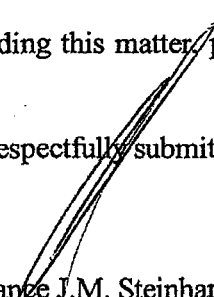
RE: Image Access, Inc. d/b/a NewPhone
Docket No. 080523-TX

Dear Ms. Salak:

Pursuant to your letter dated September 16, 2008, enclosed please find original data request responses for Image Access, Inc. d/b/a NewPhone ("NewPhone"). Also attached as Exhibit "D" is a signed compliance Affidavit.

If you have any questions regarding this matter, please do not hesitate to call me. Thank you for your attention to this matter.

Respectfully submitted,


Lance J.M. Steinhart, Esq.
Attorney for Image Access, Inc. d/b/a NewPhone

Enclosures

cc: Mr. Jim R. Dry
Bob Casey - via e-mail
Catherine Beard - via e-mail

DOCUMENT NUMBER-DATE

09868 OCT 16 08

FPSC-COMMISSION CLERK

General Data Requests for 080523-TX

1. Does NewPhone provide Lifeline service in any other state? If so, please list the state(s) and whether this service is provided through a wholesale local platform (formerly UNEs) or through resale. In addition, have any of these states utility commissions received any complaints concerning NewPhone service in that state in the past three years? If so, please describe in detail.

RESPONSE: NewPhone currently offers LifeLine products in the AT&T services areas under Resale. To our knowledge there are no open complaints concerning NewPhone in any of the states we provide service.

2. Has NewPhone 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 NewPhone filed for ETC status in any state and subsequently withdrawn the petition? If so, please list the state and docket.

RESPONSE: NewPhone has not been granted or denied ETC status in any other state. NewPhone has not filed for ETC status in any state and subsequently 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. Please include signed evidence of the agreements, along with invoices detailing both UNE and resale charges.

RESPONSE: Please see attached Exhibit "A".

4. What facilities, planned or existing, does NewPhone have in Florida in order to serve Florida customers? Please include the cost of these facilities.

RESPONSE: NewPhone does not own, operate, or provide service in the State of Florida through the use of its own facilities. Current plans call for NewPhone to continue to provide service to its end users through resale, and to lease switched port/loop combination UNE's.

5. How many Florida residential and commercial customers does NewPhone presently serve? Please provide both the number of residential and business customers, and how many are served by UNEs and how many are served through resale.

RESPONSE: 858 residential and 0 business customers. All are currently resale lines.

DOCUMENT NUMBER-DATE

09868 OCT 16 08

FPSC-COMMISSION CLERK

6. Please provide examples about how NewPhone advertises or will advertise, using media of general distribution, the availability of the supported services and what the charges are for these services. What specific plans does NewPhone have for advertising its offering of Lifeline Service in Florida?

RESPONSE: We are currently advertising on TV in Florida specifically using the Lifeline opportunity for low income customers. Our average monthly advertising expenditure for the last six months is \$9,468.00. We expect that amount to continue or increase.

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

RESPONSE: Yes. At present, 100% of NewPhone's service is provided on a prepaid basis.

8. What is the average customer bill for a NewPhone 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.

RESPONSE: NewPhone's average residential customer bill is \$44.19. This average figure includes taxes and Lifeline credits.

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

RESPONSE: No. NewPhone residential customers are not required to subscribe to NewPhone long-distance services.

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

RESPONSE: NewPhone plans to provide Lifeline service within 60 days of ETC designation.

11. NewPhone's application requests ETC status in non-rural areas of BellSouth/AT&T. Does NewPhone's application include a complete list of all the Florida wire centers in the BellSouth service area? If not, please detail why certain wire centers have been omitted.

RESPONSE: See List attached hereto as Exhibit B.

12. Describe NewPhone'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 wire line local component (charge for local phone service) for which universal service compensation would be based on?

RESPONSE: NewPhone's product offerings incorporate customer local usage into its basic price. We currently do not charge extra fee's for minutes of usage in extended local calling areas. Once ETC certified, NewPhone intends to pass through the appropriate credits reducing the monthly recurring price for LifeLine approved customers.

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

RESPONSE: NewPhone will offer the use of the same 911 services to its end users as those offered by the ILECs to their own end users.

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

RESPONSE: Yes. NewPhone's customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. 54.101(a)(8).

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

A. state commission may grant the petition 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 petition 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 NewPhone to accomplish these network upgrades? Please include in your response all upgrades and the area where the upgrade will be installed.

RESPONSE: Not Applicable.

16. Does NewPhone understand that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions?

RESPONSE: NewPhone understands that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions.

17. Does NewPhone have any outstanding complaints at the Federal Communications Commission? Please provide detailed documentation of any complaint filed at the FCC in the past three years.

RESPONSE: NewPhone does not have any outstanding complaints at the Federal Communications Commission.

18. Is NewPhone's account current with the Federal Communications Commission in regards to regulatory fees? If not, please explain what steps, if any, are being taken to resolve/rectify this situation.

RESPONSE: To the best of NewPhone's knowledge, NewPhone's account is current with the Federal Communications Commission in regards to regulatory fees.

19. Is NewPhone's account current with the Universal Service Administrative Company in regards to universal service contributions? Please detail the annual amounts paid in the past three years.

RESPONSE: To the best of NewPhone's knowledge, NewPhone's account is current with the Universal Service Administrative Company in regards to universal service contributions.

20. Does NewPhone understand that any resold Lifeline, Link-Up or TLS service purchased through another carrier cannot be claimed by NewPhone for reimbursement from USAC?

RESPONSE: NewPhone understands that any resold Lifeline, Link-Up or TLS service purchased through another carrier cannot be claimed by NewPhone as access lines eligible for reimbursement from USAC.

21. Please provide a list of each wire center which NewPhone is requesting ETC status in Florida.

RESPONSE: Please see attached Exhibit "B"

22. Please provide a description of NewPhone's corporate structure, with both names and titles. Please provide a list of NewPhone's owners or corporate officers and indicate if any are also owners, corporate officers or employees of any other telecommunications companies.

RESPONSE: Jim Dry - President
Richard Jaubert - Vice President and CFO
Gene Dry - Vice President
Kim Vinnett - Sales and Service General Manager
Brandi Knight - Accountant

Jim Dry, Gene Dry and Richard Jaubert are the sole owners of NewPhone and are not owners, corporate officers or employees of any other telecommunication companies.

23. Please provide an example of a typical NewPhone residential and business customer bill. What is the average residential bill in Florida?

RESPONSE: Please see attached Exhibit "C"

24. Will NewPhone seek toll limitation service reimbursement from USAC if granted ETC status? If yes, provide a detailed list of the incremental costs it will be claiming, along with a detailed description to support the amounts to be claimed.

RESPONSE: Yes, a detailed list of the incremental costs it will be claiming is as follows:

One time installation charge	\$7.82
Monthly recurring charge	\$3.87
Cost to administer per customer/per month	\$0.50

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

RESPONSE: Yes, Link-Up reimbursement will be claimed in the amount of \$30.00 per customer, or the highest amount allowable.

26. Will NewPhone seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer NewPhone would be claiming.

RESPONSE: Yes, Lifeline reimbursement will be claimed in the amount of \$13.50 per customer, per month, or the highest amount allowable.

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

RESPONSE: Yes, service is provided in bundled packages, and Lifeline discounts will apply to any bundle that a customer chooses.

28. Does NewPhone 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?

RESPONSE: Yes, NewPhone understands 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.

29. Does NewPhone 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?

RESPONSE: Yes, NewPhone understands 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.

30. Please provide NewPhone's purpose for requesting ETC status in Florida. What does the company hope to achieve? Why not just purchase resale Lifeline and Link-Up lines from your underlying carrier if the purpose of ETC designation is solely to provide Lifeline and Link-Up?

RESPONSE: NewPhone's purpose for requesting ETC status in Florida is to service a public interest group that has been neglected by the main carriers. NewPhone will make more eligible consumers aware of the Lifeline and Link-Up programs, and provide such service at a discounted rate, by applying the credit amounts, and the additional \$3.50 Florida ETC credit:

If a company provisions via resale and puts the asg usoc codes on the resale order then the main carriers can identify a life line customer and market directly to them. This would be very bad for the long term health of New Phone's customer list.

31. Please provide background information on the following docket: Before The Public Service Commission Of The State of Missouri, In the Matter of the Application of Image Access, Inc., for Approval of Its Resale Agreement with Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri Telephone, L.P. d/b/a AT&T Missouri, Case No. TK-2007-0005.

RESPONSE: NewPhone commenced negotiations for approval of a Resale Agreement with AT&T Missouri. NewPhone subsequently decided not to provide service in the State of Missouri.

EXHIBITS

Exhibit A – Evidence of UNE Agreements

Exhibit B – Wire Centers

Exhibit C – Sample Residential and Business Customer Bill

Exhibit D - Affidavit

Exhibit A – Evidence of UNE Agreements



BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Jerry.Hendrix@bellsouth.com

Jerry D. Hendrix
Vice President
Regulatory Relations

Phone: (850) 577-5550
Fax: (850) 224-5073

April 4, 2006

Mrs. Blanca S. Bayo
Director, Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

060319-TP

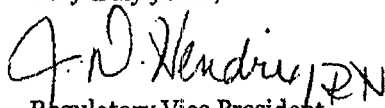
Re: Approval of Interconnection, Unbundling, Resale and Collocation Agreement
between BellSouth Telecommunications, Inc. and Image Access, Inc. d/b/a
NewPhone

Dear Ms. Bayo:

Please find enclosed for filing and approval, the original and two copies of the
Interconnection, Unbundling, Resale and Collocation Agreement between BellSouth
Telecommunications, Inc. (BellSouth) and Image Access, Inc. d/b/a NewPhone

If you have any questions please do not hesitate to contact Robyn Holland at (850)
577-5551.

Very truly yours,


Regulatory Vice President

DOCUMENT NUMBER-DATA
03022 APR -4 8
... ..

BELLSOUTH / CLEC Agreement

Customer Name: Image Access, Inc. d/b/a NewPhone

Image Access 2006 IA	2
Table of Contents	3
General_Terms_and_Conditions	5
Signature Page	25
Att1-Resale	26
Att 1 - Resale Discounts & Rates	46
Att 2 - Network Elements & Other Services	55
newAtt2-NetworkElementRates-ExhA	98
newAtt2-NetworkElementRates-ExhB	180
Att 3 - Network Interconnection	198
Att 3 - Network Element Rates	228
Att 4 - Collocation	246
Att 4 - Collocation Rates - Exhibit B	299
Att 5 - Access to Numbers and Number Portability	345
image Access Att 6Ordering	351
Att7 Billing Redline image access	360
Att 7 - CMDS Rates	380
Att 8 - Rights of Way	389
Att 9 Perf Meas Intro	391
Att 10 - Disaster Recovery Plan	393
Att 11 - BFR and NBR Process	402

Interconnection Agreement

Between

BellSouth Telecommunications, Inc.

and

Image Access, Inc. d/b/a NewPhone

**AGREEMENT
GENERAL TERMS AND CONDITIONS**

THIS AGREEMENT is made by and between BellSouth Telecommunications, Inc., (BellSouth), a Georgia corporation, and Image Access, Inc. d/b/a NewPhone and in Florida, Image Access, Inc. d/b/a NewPhone, Inc. (Image Access), a Louisiana corporation, and shall be effective on the Effective Date, as defined herein. This Agreement may refer to either BellSouth or Image Access or both as a "Party" or "Parties."

WITNESSETH

WHEREAS, BellSouth is a local exchange telecommunications company authorized to provide Telecommunications Services (as defined below) in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee; and

WHEREAS, Image Access is or seeks to become a CLEC authorized to provide telecommunications services in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee; and

WHEREAS, Image Access wishes to resell certain BellSouth's Telecommunications Services as set forth in Attachment 1, purchase Network Elements and Other Services as set forth in Attachment 2, and, primarily in connection therewith, may wish to utilize collocation space as set forth in Attachment 4 of this Agreement; and;

WHEREAS, the Parties wish to interconnect their facilities, exchange traffic and perform Local Number Portability ("LNP") pursuant to and consistent with the rights and obligations set forth in Sections 251 and 252 of the Act.

NOW THEREFORE, in consideration of the mutual agreements contained herein, BellSouth and Image Access agree as follows:

Definitions

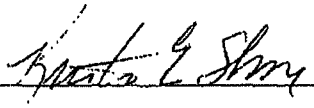
Affiliate is defined as a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term "own" means to own an equity interest (or equivalent thereof) of more than 10 percent.

Commission is defined as the appropriate regulatory agency in each state of BellSouth's nine-state region (Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee).

General Terms and Conditions
Signature Page

IN WITNESS WHEREOF, the Parties have executed this Agreement the day and year written below.

BellSouth Telecommunications, Inc.


By: 

Name: Kristen E. Shore

Title: Director

Date: 3/20/06

**Image Access, Inc. d/b/a NewPhone
and in Florida, Image Access, Inc.
d/b/a NewPhone/Inc.**

By: 

Name: GENE DRY

Title: PRESIDENT

Date: 3/14/06

Exhibit B – Wire Centers

Exhibit 1

Company	RateCenter	Switch
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ARCHER	ARCHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOCA RATON	BCRTFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BROOKSVL	BKVLFLJFDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BALDWIN	BLDWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BELLEGLADE	BLGLFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BUNNELL	BNNLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BRONSON	BRSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	BOYNTONBCH	BYBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOABEACH	CCBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CEDAR KEYS	CDKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIEFLAND	CFLDFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CHIPLEY	CHPLFLJADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CANTONMENT	CNTMFLLED1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	COCOA	COCOFMEDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CROSS CITY	CSCYFLBARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEBARY	DBRYFLMARS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELAND	DELDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELRAY BCH	DLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DELEON SPG	DLSPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DUNNELLON	DNLNFLWMRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DEERFLDBCH	DRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	DAYTONABCH	DYBHFLPODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EAU GALLIE	EGLLFLIHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	EASTORANGE	EORNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FLAGLERBCH	FLBHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FERNADNBCH	FRBHFLFPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FORTPIERCE	FTPRFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GREENCVSPG	GCSPFLCND0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GRACEVILLE	GCVLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GENEVA	GENVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GULFBREEZE	GLBRFLMCDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	GAINESVL	GSVLFLNW33E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HAVANA	HAVNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOBE SOUND	HBSDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOLLEYNVRR	HLNVFLMADS1
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	FTLAUDERDL	HLWDFLPEDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOLLYWOOD	HLWDFLWHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HOMESTEAD	HMSTFLNARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	HAWTHORNE	HWTHFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JAY	JAY FLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSOLBCH	JCBHFLMA24E
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JUPITER	JPTRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYSTN HTS	KYHGFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LAKE CITY	LKCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	LYNN HAVEN	LYHNFLOHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MICANOPY	MCNPFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIDDLEBURG	MDBGFLPMDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MIAMI	MIAMFLWMDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MELBOURNE	MLBRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MILTON	MLTNFLRADS0

BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JACKSONVL	MNDRFLLODS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JULINGTON	MNDRFLLWRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MUNSON	MNSNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	MAXVILLE	MXVFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NORTH DADE	NDADFLOLDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NWSMYRNBCH	NSBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	NEWBERRY	NWBYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OAK HILL	OKHLFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OLD TOWN	OLTWFLLNRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORLANDO	ORLDFLSADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ORANGEPARK	ORPKFLWDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PACE	PACFLPVRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PAHOKEE	PAHKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNAMACYBCH	PCBHFLNTDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALM COAST	PLCSFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PALATKA	PLTKFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	CORAL SPG	PMBHFLCSDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMPANOCH	PMBHFLTADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	POMONAPARK	PMPKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PANAMACITY	PNCYFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PENSACOLA	PNSCFLWADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PNTVDRABCH	PNVDFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PERRINE	PRRNFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PIERSON	PRSNFLFDRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	PTST LUCIE	PTSLFLSOCG0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SEBASTIAN	SBSTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	KEYS	SGKYFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	OVIEDO	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SANFORD	SNFRFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STAUGUSTIN	STAGFLSHRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	ST JOHNS	STAGFLWGRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	JENSEN BCH	STRTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	STUART	STRTFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	SUNNYHILLS	SYHSFLCCRS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TRENTON	TRENFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	TITUSVILLE	TTVLFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERNON	VERNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	VERO BEACH	VRBHFLMADS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WELAKA	WELKFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WPALMBEACH	WPBHFLRPDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	WEEKICHSPG	WWSPFLSHDS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YONGSTFNTN	YNFNFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YANKEETOWN	YNTWFLMARS0
BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL	YULEE	YULEFLMARS0

Exhibit C – Sample Residential and Business Customer Bill

[REDACTED]

October 14, 2008
 Customer ID: [REDACTED]

If you choose to mail your payment, please mail it early enough so that it reaches our office before your services are suspended.

Please mail your monthly payment to us in the enclosed envelope. Please note that it is no longer a postage paid envelope. If you prefer, you can pay at MoneyGram via "Express Payment", Western Union via "Quick Collect", Green Dot via "MoneyPak", use your credit or debit card, or via automatic checking account withdrawals. Since we do not require a deposit, we must receive your monthly payment on or before the due date below.

Additional charges may apply on returned checks, suspended services, and orders to change service. Please call our Customer Service Department for additional information or email us at info@newphone.com.

Unlike most of our competitors, we do offer a grace period of approximately **5 days** after your due date. However, your service will be suspended at the end of the grace period. If you are suspended, your regular monthly payment plus a restore fee (varies by state) is required before your service will be reactivated.

Note to Unlimited Long Distance subscribers:

NewPhone reserves in its sole discretion to terminate, suspend, or restrict service without notice on any activity presumed to be inconsistent with residential use.

Current Features and Blocks	Price
Local Telephone Service, 911 Fee & TASA	
FCC Charge for Network Access	\$6.50
SOMEc Amortization Fee	\$2.00
911 and other Municipal Taxes	\$1.41
Federal Excise Tax	\$1.20
State Sales Tax	\$2.40
Basic Service	\$39.95
LifeLine Credit	(\$10.00)
State LifeLine Credit	(\$1.77)

(please mail bottom portion of bill with your payment)

Total Amount Due: \$41.69

Past Due Amount	Current Charges	Due Date
\$ 0.00	\$ 41.69	11/1/08

Total Enclosed: _____

All past due balances must be paid in full before any prepaid long distance can be added.

Customer ID: [REDACTED]

(904) 766-3376

Exhibit D - Affidavit

AFFIDAVIT

State of Louisiana
Parish of East Baton Rouge

BEFORE ME, the undersigned authority, appeared, who deposed and said:

My name is Jim R. Dry, I am employed by Image Access, Inc. d/b/a NewPhone ("NewPhone"), located at 5555 Hilton Avenue, Suite 415, Baton Rouge, Louisiana 70808 as its President. I am an officer of NewPhone and am authorized to give this affidavit on behalf of NewPhone. This affidavit is being given to support the Eligible Telecommunications Carrier petition filed by NewPhone with the Florida Public Service Commission (PSC).

NewPhone hereby certifies the following:

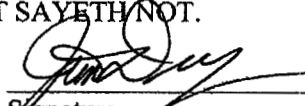
1. NewPhone will follow all Florida Statutes, Florida Administrative Rules, and Florida PSC Orders relating to Universal Service, Eligible Telecommunications Carriers, and the Florida Link-Up and Lifeline Program.
2. NewPhone will follow all FCC rules, FCC Orders, and regulations contained in the Telecommunications Act of 1996 regarding Universal Service, ETCs, Link-Up and Lifeline, and toll limitation service.
3. NewPhone agrees that the Florida PSC may revoke a carrier's ETC status for good cause after notice and opportunity for hearing, for violations of any applicable Florida Statutes, Florida Administrative Rules, Florida PSC Orders, failure to fulfill requirements of Sections 214 or 254 of the Telecommunications Act of 1996, or if the PSC determines that it is no longer in the public interest for NewPhone to retain ETC status.
4. NewPhone understands that if its petition for ETC status is approved, it will be for limited ETC status to provide Link-Up, Lifeline, and toll-limitation service only, and NewPhone will be eligible only to receive low-income support from the Universal Service Fund.
5. NewPhone understands that it may only receive reimbursement from the Universal Service Administrative company (USAC) for active customer Link-Up and Lifeline access lines which are provided using its own facilities or using access lines obtained as wholesale local platform lines (formerly UNE lines) from another carrier. NewPhone shall not apply to USAC for reimbursement of Link-Up and Lifeline access lines obtained from an underlying carrier which already receive a Lifeline and/or Link-Up credit provided by the underlying carrier.
6. NewPhone understands that the PSC shall have access to all books of account, records and property of all eligible telecommunications carriers.

7. NewPhone understands that low income support reimbursed by USAC for toll limitation service is available only for the incremental costs that are associated exclusively with toll limitation service.
8. NewPhone agrees that upon request, it will submit to the PSC a copy of Form 497 forms filed with USAC to:

Florida Public Service Commission
 Division of Regulatory Compliance, Market Practices Section
 2540 Shumard Oak Drive
 Tallahassee, Florida 32303

9. NewPhone understands that in accordance with the Florida Lifeline program, eligible customers will receive a \$13.50 monthly discount on their phone bill, \$3.50 of which is provided by the ETC, and \$10.00 of which is reimbursable from the Federal Universal Service Fund.

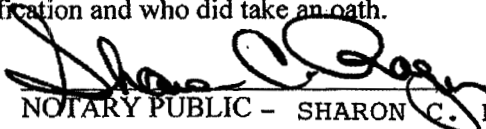
FURTHER AFFIANT SAYETH/NOT.

	10/9/08
_____ Signature	_____ Date
Jim R. Dry	
_____ Printed Name	

Business Address:
 5555 Hilton Avenue, Suite 415
 Baton Rouge, Louisiana 70808

State of Louisiana
~~County~~ of East Baton
 Parish

Acknowledged before me this 9th day of October, by
Jim R. Dry, as Owner of Image Access, Inc. d/b/a NewPhone,
 who is personally known to me or produced identification and who did take an oath.


 NOTARY PUBLIC - SHARON C. RAGUSA#039606

SHARON C. RAGUSA
 Printed Name of Notary

Personally Known XX
 Produced Identification _____
 Type of Identification Produced _____