

**Kimberley Pena**

**From:** Charlotte Lacey [clacey@telecomcounsel.com]  
**Sent:** Wednesday, February 18, 2009 5:13 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Teledias Communications, Inc. - Docket No. 080650-TX  
**Attachments:** 20090218171644193.pdf

Please see the attached data request responses for Teledias Communications, Inc.

*Charlotte Lacey, Legal Assistant  
Lance J.M. Steinhart, PC  
1720 Windward Concourse  
Suite 115  
Alpharetta, GA 30005  
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=====  
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DOCUMENT NUMBER-DATE

01390 FEB 19 8

FPSC-COMMISSION CLERK

2/19/2009

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February 18, 2009

**VIA E-FILING ONLY**

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: Teledias Communications, Inc.  
Docket No. 080650-TX

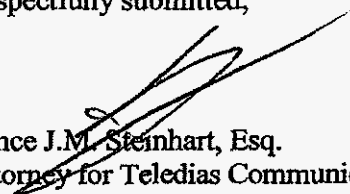
Dear Ms. Salak:

Pursuant to your letter dated February 25, 2008, enclosed please find one original of the data request responses for Teledias Communications, Inc.

Please return a stamped copy of the extra copy of this letter in the enclosed preaddressed prepaid envelope.

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 Teledias Communications, Inc.

Enclosures  
cc: Janet Tripi

DOCUMENT NUMBER-DATE

01390 FEB 19 8

FPSC-COMMISSION CLERK

**General Data Requests for Docket No. 080650-TX**

1. Does TeleDias 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 state utility commissions received any complaints concerning TeleDias service in that state in the past three years? If so, please describe in detail.

**RESPONSE: TeleDias currently provides Lifeline service in the state of Georgia through resale. The GA PSC has not received any complaints regarding TeleDias since April 2008, when the company began offering local service.**

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 TeleDias filed for ETC status in any state and subsequently withdrawn the petition?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

**RESPONSE: No.**

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 Agreement with AT&T (EXHIBIT D).**

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

**RESPONSE: TeleDias does not own, operate, or provide service in the State of Florida through the use of its own facilities. Current plans call for TeleDias to provide service to its end users through the leasing of switched port/loop combination UNE's (previously known as UNE-P) from the Incumbent or through resale.**

5. How many Florida residential and commercial customers does TeleDias 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: TeleDias currently has no customers in Florida. The company will begin sales to Florida customers in February 2009.**

6. Please provide examples about how TeleDias 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 TeleDias have for advertising its offering of Lifeline Service in Florida?

**RESPONSE: TeleDias will advertise through its website, direct marketing, agents and special event participation.**

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

**RESPONSE: TeleDias does not offer prepaid service.**

8. What is the average customer bill for a TeleDias 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: Currently, the average customer bill in Georgia is \$39.00 for direct-billed customers and \$55.00 for customers billed through agents.**

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

**RESPONSE: No.**

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

**RESPONSE: TeleDias would begin offering Lifeline service as an ETC within two weeks, as the platform through AT&T is already in place.**

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

**RESPONSE: Yes, TeleDias' application included a complete list of the Florida wire centers in the BellSouth/AT&T and Verizon service areas.**

12. Describe TeleDias'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.

**RESPONSE: TeleDias offers a 3-feature Calling Plan for \$39.00/mo. for direct-billed customers and the same Plan for \$55.00/mo. if billed through an agent. Inside Wiring Maintenance Plan is offered for \$5.00/mo.**

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

**RESPONSE: TeleDias will be able to offer the use of the same 911 services to its end users as those offered by the ILEC or RBOC to its own end users.**

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

**RESPONSE: TeleDias intends to routinely order toll restriction, which, with the exception of toll free numbers, blocks access to all 1+ dialing patterns. Pursuant to 47 C.F.R. 54.101(a)(9), toll restriction will be provided at no charge.**

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

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

**RESPONSE: TeleDias will not be requesting additional time to complete network upgrades.**

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

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

17. Does TeleDias 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: TeleDias has no outstanding FCC complaints.**

18. Is TeleDias' 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: All TeleDias accounts with the FCC are current.**

19. Is TeleDias' 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: All TeleDias USAC contributions are current.**

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

**RESPONSE: Yes.**

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

**RESPONSE: See EXHIBIT II.**

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

**RESPONSE: See EXHIBIT III. The average residential customer bill in Florida will be \$39.00 for direct-billed customers.**

23. Will TeleDias 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:**

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

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

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

25. Will TeleDias seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer TeleDias 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.**

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

**RESPONSE: TeleDias does provide bundles packages and will provide the \$13.50 Lifeline discount to customers.**

27. Does TeleDias understand that Florida ETCs are required to 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, TeleDias understands that Florida ETCs are required to provide a non-reimbursable \$3.50 credit per month to each Lifeline customer's bill in addition to the Federal \$10.00 reimbursement credit.**

28. Does TeleDias 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 ETC's expense?

**RESPONSE: Yes.**

29. Please provide TeleDias'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: TeleDia's purpose for requesting ETC status in Florida is to make more eligible consumers aware of the Lifeline and Link-Up programs, and to provide such service at a discounted rate, by applying the credit amounts, and the additional \$3.50 Florida ETC credit.**



30. Please explain who handles billing for TeleDias. What is the customer service telephone number and what are the business hours when a customer can talk directly to a TeleDias employee?

**RESPONSE: At present, TeleDias billing is prepared in-house.**

**The Customer Service telephone number is: 877-829-7856**

**Customer Service hours are: M-F 9:00 a.m. – 6:00 p.m.; SAT. 10:00 a.m. – 2:00 p.m.**

31. How many staff members does TeleDias currently employ?

**RESPONSE: TeleDias employs four staff members.**

32. Where are the books and records for TeleDias's Florida operations located? Do you understand that if, for any reason, the Florida Commission may require to see those books, it would be incumbent upon you to produce them at your own cost?

**RESPONSE: The books and records for TeleDias' Florida operations will be located at its corporate headquarters, 5605 Riggins Court, Reno, NV 89502. TeleDias understands it will provide books and records at its own cost, if requested.**

33. Please explain the business relationship between TeleDias and Digital Verification Services, Inc. What services does Digital Verification Services, Inc. provide?

**RESPONSE: There is no business relationship between TeleDias and Digital Verification Services, Inc. ("DVS"). At one time, DVS did provide third party verification services for TeleDias and other long distance customers. However, DVS has been out of business since 2005.**

**EXHIBIT I**

**Agreement with AT&T**

**Amendment  
To The  
Resale Agreement Between  
BellSouth Telecommunications, Inc.  
d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia,  
AT&T Kentucky, AT&T Louisiana, AT&T Mississippi,  
AT&T North Carolina, AT&T South Carolina and  
AT&T Tennessee  
Dated November 25, 2007**

Pursuant to this Amendment (the "Amendment"), BellSouth Telecommunications, Inc. d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina and AT&T Tennessee ("AT&T") and TeleDias Communications, Inc. ("TeleDias"), hereinafter referred to collectively as the "Parties," hereby agree to amend that certain Resale Agreement between the Parties dated November 25, 2007 (Agreement) to be effective thirty (30) calendar days after the date of the last signature executing the Amendment (Effective Date).

WHEREAS, AT&T and TeleDias entered into the Agreement on November 25, 2007, and;

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby covenant and agree as follows:

1. The Parties agree to replace the initial Section in the General Terms and Conditions and replace with the following language:

**THIS AGREEMENT** is made by and between BellSouth Telecommunications, Inc. d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina and AT&T Tennessee, (AT&T), TeleDias Communications, Inc. (TeleDias), a Nevada Profit Corporation, and shall be effective on the Effective Date, as defined herein. This Agreement may refer to either AT&T or TeleDias or both as a "Party" or "Parties."

2. Any reference to BellSouth in the Agreement shall be deemed to mean AT&T as described in Section 1 above.
3. The Parties agree to delete the second Whereas clause in the General Terms and Conditions and replace with the following:

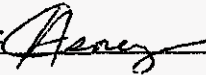
**WHEREAS**, TeleDias is or seeks to become a CLEC authorized to provide telecommunications services in the states of Georgia and Florida.

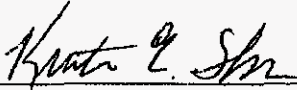
4. The Parties agree to add Attachment 1, Resale Discounts & Rates for the state of Florida as Exhibit 1 attached hereto and by reference incorporated into this Amendment.
5. All of the other provisions of the Resale Agreement, dated November 25, 2007, shall remain in full force and effect.

6. Either of both of the Parties are authorized to submit this Amendment to the respective state regulatory authorities for approval subject to Section 252(e) of the Federal Telecommunication s Act of 1996.
7. In entering into this Amendment, neither Party waives, and each Party expressly reserves, any rights, remedies or arguments it may have at law or under the intervening law or regulatory change provisions in the underlying Agreement (including intervening law rights asserted by either Party via written notice predating this Amendment) with respect to any orders, decisions, legislation or proceedings and any remands thereof which the Parties have not yet fully incorporated into this Agreement or which may be the subject of further review.

TeleDias Communications, Inc.

BellSouth Telecommunications, Inc.  
 d/b/a AT&T Alabama, AT&T Florida, AT&T  
 Georgia, AT&T Kentucky, AT&T Louisiana,  
 AT&T Mississippi, AT&T North Carolina, AT&T  
 South Carolina and AT&T Tennessee

By:   
 Name: Carmen Asorey  
 Title: Vice President  
 Date: July 17, 2008

By:   
 Name: Kristen Shore  
 Title: Director  
 Date: 9/17/08

	<u>OCN #</u>	<u>ACNA</u>		<u>OCN #</u>	<u>ACNA</u>
ALABAMA	_____	_____	MISSISSIPPI	_____	_____
FLORIDA	_____	_____	NORTH CAROLINA	_____	_____
GEORGIA	897E	EDD	SOUTH CAROLINA	_____	_____
KENTUCKY	_____	_____	TENNESSEE	_____	_____
LOUISIANA	_____	_____			

RESALE DISCOUNTS & RATES - Florida										Att 1 Excl 0																								
CATEGORY	RATES ELEMENTS	Initial	Zone	ECE	USOC	RATES(\$)	Evs Order Submitted Ets per LSR	Evs Order Submitted Manually per LSR	Incremental Charge - Manual Evs Order vs. Electronic	Incremental Charge - Manual Evs Order vs. Electronic-Adult	Incremental Charge - Manual Evs Order vs. Electronic-Dis Adult	Incremental Charge - Manual Evs Order vs. Electronic-Dis Adult	QSS Rates(\$)																					
													Res	First	Additional	First	Adult	SOMEC	SOWAN	SOWAN	SOWAN	SOWAN	SOWAN											
<b>RESALE APPLICABLE DISCOUNTS</b>																																		
	Standard %					21.85																												
	Resale %					18.51																												
	CEAs %					18.51																												
<b>OPERATIONS SUPPORT SYSTEMS (OSS) - "REGIONAL RATES"</b>																																		
NOTE: (1) CLEC should contact its current negotiator if it prefers the "state specific" OSS charges as ordered by the State Commission. The OSS charges currently contained in this rate exhibit are the AT&T "regional" service ordering charges. CLEC may elect either the state specific Commission ordered rates for the service ordering charges, or CLEC may elect the regional service ordering charges, however, CLEC can not obtain a mixture of the two regardless if CLEC has a bilateral contract established in each of the 9 states.																																		
	OSS - Electronic Service Order Charge, Per Local Service Request (LSR) - Resale Only				SOMEC	8.90	0.00	3.50	0.00																									
	OSS - Manual Service Order Charge, Per Local Service Request (LSR) - Resale Only				SOWAN	19.99	0.00	19.99	0.00																									
<b>ODU/ODUP SERVICES</b>																																		
<b>OPTIONAL DAILY USAGE FEE (ODUP)</b>																																		
	ODUP: Recording, per message					0.0000071																												
	ODUP: Message Processing, per message					0.001148																												
	ODUP: Message Processing, per Message Type provided					35.91																												
	ODUP: Data Transmission (CONVIRT-SPEC), per message					0.00010275																												
<b>MANUAL ODUP OPTIONAL DAILY USAGE FEE (ODUP)</b>																																		
	ODUP: Message Processing, per message					0.000096																												
<b>SELECTIVE CALL ROUTING (SCR) LINE CLASS CODES (SCR-LCC)</b>																																		
	Selective Routing Per Unique Line Class Code Per Request Per Switch					93.85	93.85	12.71	12.71																									
<b>DIRECTORY ASSISTANCE CUSTOM BRANDING ANNOUNCEMENT via OLIS SOFTWARE</b>																																		
	Recording of CA Custom Branded Announcement					3,000.00	3,000.00																											
	Loading of CA per Switch per OCN					1,170.00	1,170.00																											
<b>DIRECTORY ASSISTANCE UNBRANDING via OLIS SOFTWARE</b>																																		
	Loading of CA per OCN (T OCN per OCN)					428.00	428.00																											
	Loading of CA per Switch per OCN					18.00	18.00																											
<b>OPERATOR ASSISTANCE CUSTOM BRANDING ANNOUNCEMENT via OLIS SOFTWARE</b>																																		
	Recording of Custom Branded CA Announcement					7,000.00	7,000.00																											
	Loading of Custom Branded CA Announcement per SW/MAY per OCN					500.00	500.00																											
	Loading of CA Custom Branded Announcement per Switch per OCN					1,170.00	1,170.00																											
<b>OPERATOR ASSISTANCE UNBRANDING via OLIS SOFTWARE</b>																																		
	Loading of CA per OCN (Regional)					1,200.00	1,200.00																											

**EXHIBIT II**

**Description of corporate structure**



## Corporate Business Background

TeleDias Communications, Inc. ("TeleDias") is a "C" corporation, organized under the laws of Nevada.

The TeleDias Management Team has many years of telecommunications industry experience, which, combined with a highly professional in-house Customer Service Department, enables the Company to offer consistent and high quality local telecommunications products.

TeleDias has no shares, control nor ownership of any telecommunications carrier, or person substantially engaged in the business of telecommunications. TeleDias has no subsidiaries.

There is no action or outstanding judgment against key personnel employed by TeleDias or persons having a substantial interest in TeleDias.

TeleDias has 1,000 shares of stock and has issued 100 shares of voting stock of which Carmen Asorey is the sole owner.

The officers of TeleDias are:

### **President/Secretary/Director**

Kirk Schumacher  
5605 Riggins Court, Suite 265  
Reno, NV 89502

### **Vice President/Director**

Carmen Asorey  
5605 Riggins Court, Suite 265  
Reno, NV 89502



**EXHIBIT III**

**Sample customer bill**



**Due: Mon, Feb 23, 09**  
**Total: \$39.00**  
 Statement# 7461 Customer# 99999

**Cliente Favorito**  
 999 Oak DR NE  
 APT F  
 Atlanta, GA 30345-1007

**Remit to:**  
 TeleDias Communications, Inc  
 10800 Alpharetta Hwy  
 Suite 208 #415  
 Roswell, GA 30076 1467

**Summary**

Balance Information	
Previous Balance	39.00
Payments Received - Thank you!	(39.00)
Balance Forward	
New Charges	
Recurring Charges	49.00
LifeLine credit	(10.00)
Total Amount Due	39.00

**Payments**

Description	Date	Amount
Payment Received, Thank you!	1/28/09	(39.00)
<b>Subtotal</b>		<b>(\$39.00)</b>

**Recurring Charges**

Number: (877) 829-7856

Description	Start	End	Amount
Plan Completo	2/23/09	3/22/09	39.00
<b>Subtotal</b>			<b>\$39.00</b>

**Tres Opciones de Pago**

<p><b>Por Telefono al 1-877-829-7856</b></p> <p>Usando estas dos formas de pago:</p> <ul style="list-style-type: none"> <li>▪ Su Tarjeta de Credito o Debito (solo Visa o MasterCard)</li> <li>▪ Su Cuenta de Cheque</li> </ul>	<p><b>Enviando por Correo</b></p> <ul style="list-style-type: none"> <li>▪ Money Order</li> </ul> <p>Teledias Communications          10800 Alpharetta Hwy Suite 208 #415          Roswell, GA 30076</p>	<p><b>MoneyGram</b>          En Todos los Walmart</p> <p>Pague a: Teledias Communications         Codigo de Recibo: 6731          Numero de Cuenta: 0000000000</p>
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