

Ruth Nettles

From: Charlotte Lacey [clacey@telecomcounsel.com]
Sent: Wednesday, May 13, 2009 5:04 PM
To: Filings@psc.state.fl.us
Subject: Affordable Phone Services, Inc. - Docket No. 090110-TX
Attachments: 20090513164724640.pdf

Please see the attached responses to data requests for Docket No. 090110-TX. Thank you!



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5/14/2009

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May 13, 2009

VIA E-FILING ONLY

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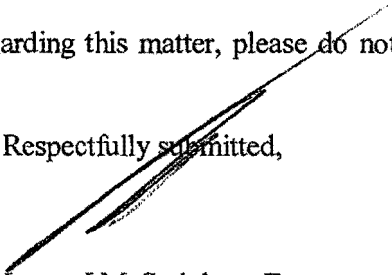
RE: Affordable Phone Service, Inc. d/b/a High Tech Communications
Docket No. 090110-TX

Dear Ms. Salak:

Pursuant to your letter dated April 24, 2008, enclosed please find an original of data request responses for Affordable Phone Service, Inc. d/b/a High Tech Communications

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 Affordable Phone Service, Inc.
d/b/a High Tech Communications

Enclosures
Mr. Joseph Fernandez

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General Data Requests for Docket No. 090110-TX

1. Does High Tech Communications 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 High Tech Communications service in that state? If so, please describe.

RESPONSE: See response in Docket No. 080107-TX Data Request.

2. Has High Tech Communications 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 Has High Tech Communications filed for ETC status in any state and subsequently withdrawn the petition?

RESPONSE: High Tech Communications has been granted ETC status in Alabama (Docket No. 29330), North Carolina (Docket No. P-100: Sub 133C) and South Carolina (Docket No. 2008-249-C. No state has denied ETC status to High Tech.

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.

RESPONSE: See response in Docket No. 080107-TX Data Request.

4. What facilities, planned or existing, does High Tech Communications have in Florida in order to serve Florida customers?

RESPONSE: See response in Docket No. 080107-TX Data Request.

5. How many Florida residential and commercial customers does High Tech Communications presently serve?

RESPONSE: High Tech currently serves approximately 3,500 residential customers through resale.

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6. According to 47 C.F.R. 54.202(d), "A common carrier seeking designation as an eligible telecommunications carrier under section 214(e)(6) for any part of tribal lands shall provide a copy of its Application to the affected tribal government and tribal regulatory authority, as applicable, at the time it files its Application with the Federal Communications Commission. In addition, the Commission shall send the relevant public notice seeking comment on any Application for designation as an eligible telecommunications carrier on tribal lands, at the time it is released, to the affected tribal government and tribal regulatory authority, as applicable, by overnight express mail." Are you requesting to provide service in any tribal areas?

RESPONSE: See response in Docket No. 080107-TX Data Request.

7. Please provide examples about how High Tech Communications advertises or will advertise, using media of general distribution, the availability of the supported services and what the charges are for these services.

RESPONSE: See response in Docket No. 080107-TX Data Request.

8. Does High Tech Communications provide service to its customers via a prepaid service? If so, what percentage of its customers receive their service via a prepaid service?

RESPONSE: See response in Docket No. 080107-TX Data Request.

9. What is the average customer bill for a High Tech Communications 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: See response in Docket No. 080107-TX Data Request.

10. As a condition of receiving local service, are High Tech Communications residential customers required to subscribe to High Tech Communications long-distance services?

RESPONSE: See response in Docket No. 080107-TX Data Request.

11. What specific plans does High Tech Communications have for advertising its offering of Lifeline Service in Florida?

RESPONSE: See response in Docket No. 080107-TX Data Request.

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

RESPONSE: See response in Docket No. 080107-TX Data Request.

13. High Tech Communications' petition requests ETC status in non-rural areas of BellSouth/AT&T's service territory. Does High Tech Communications request ETC status in non-rural and rural areas? In Exhibit 1 of your petition, High Tech list rate centers for Sprint-Florida and Verizon. Does High Tech seek ETC status in these areas also?

RESPONSE: See response in Docket No. 080107-TX Data Request.

14. Describe High Tech Communications' 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: See response in Docket No. 080107-TX Data Request.

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

RESPONSE: See response in Docket No. 080107-TX Data Request.

16. Do High Tech Communications' customers have access to competitive directory assistance providers, as defined as by 47 C.F.R. 54.101(a)(8).

RESPONSE: See response in Docket No. 080107-TX Data Request.

17. Describe the toll-limitation features of High Tech Communications. See 47 C.F.R. 54.101(a)(9).

RESPONSE: See response in Docket No. 080107-TX Data Request.

18. 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 High Tech Communications to accomplish these network upgrades? Please include in your response all areas for which you are seeking ETC designation.

RESPONSE: See response in Docket No. 080107-TX Data Request.

19. Does High Tech Communications 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: See response in Docket No. 080107-TX Data Request.

20. Does High Tech Communications have any outstanding complaints at the Federal Communications Commission? If yes, please provide a synopsis of these complaints.

RESPONSE: See response in Docket No. 080107-TX Data Request.

21. Is High Tech Communications' 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: See response in Docket No. 080107-TX Data Request.

22. Is High Tech Communications' account current with the Universal Service Administrative Company in regards to universal service contributions?

RESPONSE: See response in Docket No. 080107-TX Data Request.

23. 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.

RESPONSE: See response in Docket No. 080107-TX Data Request.

24. Does High Tech Communications understand that any resold Lifeline, Link-Up or TLS service purchased through another carrier cannot be claimed by High Tech Communications Teleconnect as access lines eligible for reimbursement from USAC?

RESPONSE: See response in Docket No. 080107-TX Data Request.

25. Please provide a list of each wire center which High Tech Communications is requesting ETC status in Florida.

RESPONSE: See response in Docket No. 080107-TX Data Request.

26. Please provide High Tech Communications' corporate structure.

RESPONSE: See response in Docket No. 080107-TX Data Request.

27. Please provide a list of High Tech Communications' owners or corporate officers and indicate if any are also owners or corporate officers of any other Telecommunication Companies.

RESPONSE: See response in Docket No. 080107-TX Data Request.

28. Please provide an example of a typical High Tech Communications residential and business customer bill. What is the average residential bill in Florida?

RESPONSE: See response in Docket No. 080107-TX Data Request.

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

RESPONSE: See response in Docket No. 080107-TX Data Request.

30. Will High Tech Communications seek Lifeline reimbursement from USAC if granted ETC status? If yes, list the amount per customer High Tech would be claiming.

RESPONSE: See response in Docket No. 080107-TX Data Request.

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

RESPONSE: See response in Docket No. 080107-TX Data Request.

32. Does High Tech Communications 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: See response in Docket No. 080107-TX Data Request.

33. Does High Tech Communications 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: See response in Docket No. 080107-TX Data Request.

34. Please provide High Tech'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?

RESPONSE: Express Phone Service, Inc.'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. In addition, if a company provisions via resale and puts the ASG USOC codes on the resale order then the ILEC can identify a life line customer and market directly to them. This creates another competitive advantage to the ILEC, and a competitive disadvantage to Express Phone.

35. Is High Tech presently providing Lifeline service in Florida to consumers using resold access lines from its underlying carrier? If so, how many Lifeline customers are being served?

RESPONSE: Yes, High Tech currently has approximately 3,000 Lifeline customers in the State of Florida.