

**REDACTED**

**LAW OFFICES OF THOMAS K. CROWE, P.C.**

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September 20, 2010

**BY FEDEX (850-413-6770)**

Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

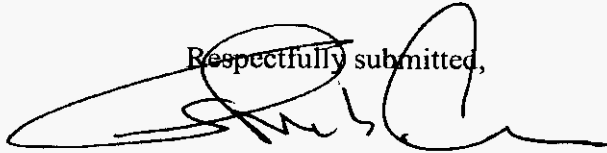
Re: Confidentiality Request; Data Request No. 1;  
Investigation of Optic Internet Protocol, Inc.

Dear Ms. Cole:

Please find enclosed, on behalf of our client, Optic Internet Protocol, Inc. ("OIP" or "Company"), the Company's response to Data Request No. 1 ("Response") contained in a letter from Beth Salak, Director, Division of Regulatory Analysis dated September 1, 2010. The Company, by its counsel and pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5), Florida Administrative Code, hereby claims confidential treatment of the proprietary confidential business information contained in each of the exhibits to its Response. Please find enclosed an original copy of the Response containing the claimed confidential exhibits, which have been marked as confidential and placed in a separate sealed envelope. Also enclosed are two copies of the Response with the claimed confidential exhibits redacted for public inspection.

Please acknowledge receipt of this filing by file-stamping and returning the extra copy of this letter in the self-addressed, stamped envelope provided for this purpose. Please feel free to contact the undersigned if you should have any questions or require additional information.

Respectfully submitted,



Thomas K. Crowe,  
Counsel for Optic Internet  
Protocol, Inc.

- COM \_\_\_\_\_
- APA \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- RAD   1
- SSC \_\_\_\_\_
- ADM \_\_\_\_\_
- OPC \_\_\_\_\_
- CLK \_\_\_\_\_

Enclosures

DOCUMENT NUMBER-DATE

7884 SEP 21 0

FPSC-COMMISSION CLERK

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September 20, 2010

Ray Kennedy  
Utility System Engineer Specialist Supervisor  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

RE: Optic Internet Protocol, Inc.

Dear Mr. Kennedy:

On behalf of my client, Optic Internet Protocol, Inc. ("OIP" or "Company"), this letter provides the information which was specifically requested in the document titled "Data Request No. 1".

1. *Please provide a copy of the current contract between Optic Internet Protocol, Inc. (OIP) and the following companies:*

- *Qwest Communications*
- *AT&T*
- *ILD Telecommunications, Inc. d/b/a ILD Teleservices*

Copies of the contracts with Qwest Communications and ILD Telecommunications, Inc. are included as Exhibits A and B respectively. OIP hereby amends its August 5, 2010 reply to the extent that it indicated on Page 2 that AT&T was a vendor of the Company. OIP had commenced negotiations with AT&T but never actually entered into an agreement for services.

2. *Please provide the full name of all vendors and copies of current contracts with each vendor that provides OIP the following support, plus name OIP's point-of-contact for each vendor:*

- *Marketing and sales*
- *Third party verifications*
- *Customer service*

- *Back office support (if more than one, provide all)<sup>1</sup>*
- *Regulatory support*
- *Any other contract support not covered above*

Back office support in the form of billing and collections is provided by ILD Telecommunications, Inc. d/b/a ILD Teleservices. A copy of this agreement is provided as Exhibit B.

As indicated in its July 21, 2010 letter, OIP had a telemarketing agreement with Nexophone, Inc., and a verification agreement with All Verified, both of which were terminated as of July 1, 2010. OIP recently entered into new agreements with Nexophone and All Verified which expressly exclude any services with respect to the State of Florida. Copies of these agreements are provided herewith as Exhibits C and D. OIP's point of contact for Nexophone is Roberto Obregon, and for All Verified is Lilians Chilet. As indicated in our letter dated July 21, 2010, OIP will not recommence sales or marketing activity in the state of Florida without first notifying staff.

Sophia Motta serves as OIP's customer service supervisor and provides regulatory support. There is no written agreement between OIP and Sophia Motta.

The instant law firm, as well as three law firms serving as local counsel with respect to three certification applications, provide legal services to OIP. Given their specific nature, and due to attorney-client relationship, these retainer agreements are not being supplied.

3. *Please provide the names of the person(s) and business that reside at:*

*900 Arnold Mill Road  
Roswell, GA 30075-6444*

This address is a physical mailbox only, and is owned by OIP. It serves as a mail forwarding stop, which forwards to 3050 Royal Blvd. South, Suite 165, Alpharetta, GA 30022. It is physically situated among a group of other similar forwarding mailboxes.

4. *Please provide the names of the person(s) and business that reside at:*

*2711 Centerville Road, #400  
Wilmington, DE 19808*

This is the corporate registered agent for OIP, The Company Corporation. More information about this company can be obtained at [www.incorporate.com](http://www.incorporate.com).

5. *Please provide the names of the person(s) and business that reside at:*

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<sup>1</sup> Back Office Support is defined as support for accounts payable, taxes, collections, payroll, etc.

Ray Kennedy  
September 20, 2010  
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*85 Hillcrest Avenue, N.E.  
Atlanta, GA 30317-1404*

This is the residential address of Greg Allpow.

6. *In Mr. Crowe's August 5, 2010, response to staff's request for information, the answer to Question 3 is that customer complaints are handled by a third-party customer service provider named OIP. Please provide OIP's mailing and physical address, the name of the point-of-contact at OIP, and the state(s) in which OIP is registered to conduct business.*

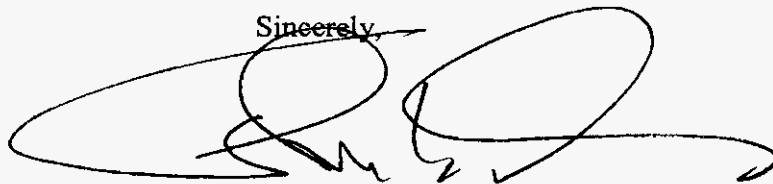
There apparently was confusion with respect to the response to Question 3 in OIP's August 5, 2010 letter. The following amends that response and provides necessary clarification. Customer complaints are handled by OIP's third party customer service representatives. The Company has four customer service representatives: Sandra Ramirez, Vanessa Rodriguez, Tony Vega and Victor Gomez. The customer service supervisor is Sophia Motta. Each of these five individuals has an independent contractor relationship with OIP. The corporate name and number previously supplied in OIP's August 5, 2010 correspondence was intended to refer to Optic Internet Protocol, Inc. itself.

7. *At the July 26, 2010, meeting with OIPI and Commission staff, Mr. Allpow stated that slamming complaints were limited to Florida and that OIPI has not been contacted about slamming complaints in any other state in which it conducts business. Is this still the case?*

OIP has reviewed its internal files and can confirm that it received from public utilities commissions in 2010 the following slamming complaints, in the following states: Nevada (1), New York (1), California (14), and Texas (18). Mr. Allpow's statement at the July 26, 2010 meeting was intended to be applicable to informal and/or formal slamming investigations only.

Please let me know if you require any additional information or have further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas K. Crowe', with a long horizontal flourish extending to the right.

Thomas K. Crowe,  
Counsel for Optic Internet Protocol, Inc.

Exhibits (A-D)

Investigation of Optic Internet Protocol, Inc. – Data Request No. 1

**EXHIBIT A – CONTRACT FOR QWEST COMMUNICATIONS**

**CONFIDENTIAL**

**[REDACTED]**

Investigation of Optic Internet Protocol, Inc. – Data Request No. 1

**EXHIBIT B – CONTRACT FOR ILD TELECOMMUNICATIONS, D/B/A ILD  
TELESERVICES**

**CONFIDENTIAL**

**[REDACTED]**



Investigation of Optic Internet Protocol, Inc. – Data Request No. 1

**EXHIBIT C – CONTRACT FOR NEXOPHONE, INC.**

**CONFIDENTIAL**

**[REDACTED]**

Investigation of Optic Internet Protocol, Inc. – Data Request No. 1

**EXHIBIT D – CONTRACT FOR ALL VERIFIED**

**CONFIDENTIAL**

**[REDACTED]**